

Introduction: Background on the FDPIR

The Food Distribution Program on Indian Reservations (FDPIR) is administered locally by either Indian Tribal Organizations (ITOs) or an agency of a State government. Currently, there are approximately 276 tribes receiving benefits under the FDPIR through 100 ITOs and 5 State agencies. Under the FDPIR program, food packages are provided monthly to low-income Native American individuals and families living on reservations and to Native American households living in approved areas near reservations and in approved service areas in Oklahoma. Foods for food packages are purchased by the United States Department of Agriculture (USDA) and shipped to ITOs and State agencies based on their orders from a list of available foods. Currently the list of available foods has approximately 80+ individual items. Authorized distributors then store and distribute the food, determine applicant eligibility, and provide some limited nutrition education to recipients. USDA provides some funds for administration but there is a 25% administrative fund matching requirement that each program must make.¹ For participation, eligibility requirements are similar to Supplemental Nutrition Assistance Program (SNAP), and based on income and other non-financial standards. Households can only participate in FDPIR or Supplemental Nutrition Assistance Program (SNAP)—recipient households cannot participate in both programs in the same month.

Research has documented that FDPIR participants have noted that FDPIR households are more likely to be elderly (60 and older) and disabled and typically on other forms of financial/income assistance (TANF or Social Security). Single-parent households constitute a relatively small proportion of household recipients but more than half of households receiving FDPIR do contain children.² The FDPIR is a cultural institution that has come to define an entire generation of eaters in Indian Country from coast to coast. Cultural nuances make reference to FDPIR, commonly known as the commodity food program, in the social life of reservation populations. For example, words like “commods,” references to “commodity cheese,” and “commod bods” are social manifestations of the federal feeding program that is so critical in addressing the nutrition needs of tribal populations. In a recent survey taken at the National FDPIR Conference, a large majority of FDPIR programs have operated over 30 years. The youngest of the FDPIR programs operating for two years. The average span of operation of a FDPIR program is 27 years.³

FDPIR is one of the few federal feeding programs that reaches the most vulnerable Indian populations – those in isolated areas and those without access to vehicles to travel to grocery

¹ The Food and Nutrition Service (FNS) does provide some leeway of the matching requirement but programs must request authorization for a matching funds waiver.

² Usher, Charles L., David S. Shanklin, and Judith B. Wildfire. 1990. Evaluation of the Food Distribution Program on Indian Reservations. Alexandria, VA: Office of Analysis and Evaluation, FNS, USDA. Also see Finegold, K. (2005). Background report on the use and impact of food assistance programs on Indian reservations. Harper, E., Orbeta, R., Southworth, L., Meade, K., Cleveland, R., Gordon, S., & Hirschman, J. (2008). FDPIR food package nutritional quality: report to Congress. *US Department of Agriculture, Food and Nutrition Service, Office of Research and Analysis, Special Nutrition Programs Report FD-08-FDPIR*. Alexandria, VA: USDA November. **(These publications are very lengthy—in excess of 100 pages—and are therefore not included in the appendices to this briefing document. Links can be provided immediately upon request.)**

³ 2015 FDPIR Survey

stores. The FDPIR program is the only federal feeding program that ONLY serves American Indian participants.

Currently, FDPIR is operated by a group of dedicated ITO program managers at the community level. A large majority of these managers are over the age of 50 and have served in their capacities as manager for over 10 years. The average year of service for a FDPIR manager is 18 years.⁴ These managers, often from the very communities they serve, have attempted to improve and evolve the “brown box” model of FDPIR to one that promotes dignity, education and community. It is important to note that they often do so while operating with limited to no resources and continual policy and budgetary changes. Many of these managers have organized and created a national organization, monitored policy changes, and have consistently found ways to engage FDPIR participants in educational initiatives, advocated for FDPIR programs on all levels of government from tribal to federal, and continue to feed Indian people across Indian Country.

⁴ 2015 FDPIR Survey

The Science of the Food Package

Currently, the composition of the food package is purportedly determined in part by the Food Package Review Work Group. This group is composed of FNS officials and NAFDPIR board members. While NAFDPIR is able to nominate individuals to sit on the Food Package Review group, these nominations can be vetoed by FNS officials. This effectively limits NAFDPIR's voice in the food package conversation. There is also no transparency on the part of FNS as to their investigation or ongoing review of nutrition scientists' findings that call into question the overall healthiness of the foods in the food package.

Examples:

- FNS lauds the FDPIR food package as receiving the highest score of any USDA nutrition assistance program package on USDA's own rubric, the Healthy Eating Index, yet recent scientific studies published in peer-reviewed journals directly contradict this claim.⁵ In fact, the study suggests that an increase in traditional foods such as bison in the food package could raise the ranking of the food package as against the USDA rubric.
- This same study indicates that according to the USDA rubric the health status of the food package has fallen in recent years by at least 20 points from 80+ on a 100 point index to in the 60+ range.
- Recent scientific data suggest that many foods in the current package contribute substantially to Type II Diabetes, depression, anxiety, suicidal ideation, and other chronic diseases that plague Native peoples.⁶
- Data from Drs. Holly Hunts and Ed Dratz, nutrition scientists from Montana State University, shows significant disparities between the USDA's Recommended Daily Allowances for certain foods and what the FDPIR food package provides, including the following findings:
 - The FDPIR food package currently provides a scant 18% of the amount of vegetables that USDA's dietary guidelines encourage a person to consume in one 30-day period in order to maintain their health.
 - The FDPIR food package currently provides foods that are high in omega-6 fatty acids. Eating large quantities of these foods has been associated with depression, anxiety, self-medicating through alcohol and/or narcotics, and suicidal ideation.
 - Given the high incidence of each of these health conditions within the American Indian community writ large, special attention must be paid to the science of the food package and immediate adjustments must be made accordingly.
- NAFDPIR's most recent request to place a Native CDC representative on the Food Package Review Group was denied by FNS.

Solutions:

⁵ Carmen Byker Shanks, et al., *Assessing Foods in the Food Distribution Program on Indian Reservations (FDPIR) Using the Healthy Eating Index 2010*, Public Health Nutrition, August 2015. (The full text of this article is contained in Appendix B to this booklet.)

⁶ This scientific data will be further explained in detail by Dr. Holly Hunts and Dr. Ed Dratz of Montana State University. Holly and Ed will be present at the briefing meeting on Feb. 22nd to explain their findings.

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- USDA should seat independent scientists, selected and approved by the NAFDPIR Board, as a separate scientific review panel focused on the content of the food package. In the alternative, these scientists must be seated on the Food Package Review Board. These scientists should be responsible for continually reviewing scientific literature and the composition of the food package in order to make sure the foods in the package are not harming FDPIR participants.
- Based on sound science, the Food Package Review Board must be able to select and eliminate foods that exacerbate life-threatening diseases in Native peoples.
- The greatest care must be taken to balance the need to provide the healthiest possible food with the need to provide a complete food package. In other words, FNS should not take this criticism to mean that all these problematic foods should be immediately pulled from the package, leaving FDPIR participants with very little food for the month. By working with scientists and having more transparency in the food package review process, the NAFDPIR Board and FNS can work together to ensure that the package transitions to one that is both culturally relevant and as healthy as possible for Native people.
- Finally, NAFDPIR should be able to seat Dean Seneca from CDC on the Food Package Work Group.

Nutrition Education for FDPIR Participants

ITO's administering FDPIR are not provided adequate nutrition education dollars to conduct nutrition education outreach or programming for their participants. Instead, they are supposed to work with Regional FNS offices for distribution and dissemination of nutrition education materials. Currently, this arrangement is not meeting the needs of ITO's or FDPIR participants. ITO's face severe funding inadequacies for nutrition education outreach and programming for FDPIR participants. There is also a lack of comprehensive distribution of nutrition education materials and nutrition education to ITO's administering FDPIR.

Examples:

- Less than \$1 million per year has been allocated to spread among 276 federally recognized Tribes to perform necessary nutrition education for FDPIR participants, even though Native people are recognized repeatedly in scientific literature and FNS studies as being the United States population group most likely to suffer from Type II Diabetes and other chronic obesity-related disorders. This funding situation would amount to \$3623/ITO if distributed equally among all programs. Clearly this level of funding is wholly inadequate.
- Regional FNS offices vary wildly in terms of their support to local ITO's administering FDPIR. Some regions do provide their ITO's with nutrition education literature and materials, while other regions go entirely without this important support. Reporting this problem to the Regional Office and the DC office has not repaired this problem.
- Tribes and ITO's are not eligible for many of the numerous alternative nutrition education funding streams within the USDA and no effort has been made to change laws or regulations governing eligibility for such competitive grant funding.
- According to recent USDA budget documents (2017 President's budget), FNS has recently awarded a contract to an entity that will evaluate how to incorporate a "nutrition paraprofessional component to the FDPIR nutrition education portfolio."
 - Who is doing this study and what does the study entail? How much was the contract?
 - Why will it take until FY2017 to complete?
 - Why is FNS conducting a study to do what the NAFDPIR Board and ITO's have been requesting for years?
 - Was a Native consulting organization familiar with FDPIR considered for this contract?
- According to USDA, "In FY 2015, FNS awarded nearly \$1 million in Food Distribution Program on Indian Reservations Nutrition Education Grants to 15 grantees." This language is from the USDA's Office of Budget & Policy Analysis, stating that only 15 grantees received funding to support nutrition education for 276 federally recognized Tribes. Again, this level of funding to only a handful of Tribes, when coupled with the lack of broad distribution of all available nutrition education materials leaves large numbers of communities with no resources for nutrition education funding.
- For the past fiscal year, FNS cited only the following as other nutrition education accomplishments in this area:
 - The creation of a double-sided banner highlighting the FDPIR program
 - A contract awarded to an unnamed entity to evaluate incorporating more nutrition education into the program.

While these efforts are appreciated, this is not enough.

Solutions:

- There should be an ongoing discussion of nutrition education funding, ITO/Tribal grant eligibility for all USDA agency nutrition education funding programs, and plans to broaden access to nutrition education funding resources through avenues other than seeking permission from State funding authorities. **We do not need more studies: we need action.**
- To that end, a nutrition education panel should be seated that plans funding and education programs for all FDPIR participants, and ensures that materials are kept current and are distributed to ALL ITO's, regardless of region.
- Regional offices that do not support their ITO's by sending nutrition education materials have cited cultural relevance as a barrier. If this is really the case, these offices should be directed to work *with* their ITO's to develop better materials instead of ignoring Native nutrition education needs. This should happen immediately.
- As always, more funding should be requested by USDA for ITO's to conduct valuable nutrition education for all 276 federally recognized Tribes who utilize the program.

Technological Infrastructure

Most Indian Tribal Organizations (ITO's) currently work with extremely outdated software on antiquated computer systems to order food for the food packages. Additionally, inventory and issuance is in one computer system, but ordering for food packages is in another system, and produce orders are in yet another system. None of those computer systems communicate with one another, and none have security features. This creates a slow ordering process that is frustrating to ITO's and unsafe for participants' data.

Examples:

NAFDPIR has been working with FNS for years to get movement on this issue. After the Tribal Leaders' meeting with FNS officials in Albuquerque last year, **there has been some slow progress, but more updates are needed** at this critical time in the administration. More can be done to expedite the software changes needed to ensure efficiency and effectiveness in technology infrastructure. Particularly, NAFDPIR needs information on:

- Any update on the recent seating of a technology committee.
- Any update on the contract to improve the technology interface
- Any business process updates
- Any activity to incorporate the advanced software and technology capacities of Tribal business entities and governmental offices in this conversation. Many Tribes have highly advanced computer technology infrastructure in place and that capacity should be utilized in a collaborative way with USDA to more rapidly correct these issues, as opposed to spending financial resources to engage outside parties unfamiliar with Tribal capacity in these areas and FDPIR program needs.
- Explanation as to why this particular issue has not been identified as a "process improvement project" for expedited review and action by USDA departmental management personnel.

Funding for Food Purchases: Meeting Future and Present Needs

FDPIR's participation level has only increased in recent years. USDA has recently reported that 102,000 Tribal members will likely use FDPIR in Fiscal Year 2016. The President's budget for FY2017 cited a 17% increase in participation. The request in the President's budget for FY2017, however, will only cover food costs for 100,000 participants per month. Increasing financial support for FDPIR will continue to be an issue, especially if the program hopes to include Alaska village sites, which should not be left out of this program or discussion. Multiple Alaska village leaders at the most recent annual meeting of NCAI cited their denied request to be included as new program sites in Alaska and with the continued impact of climate change on available subsistence food sources there will continued pressure on the FDPIR program to accommodate the requests of remote Alaska villages for program participation.

Examples:

- The current funding request in the President's budget for FY2017 for FDPIR is a budgetary increase of roughly \$5.9 million from FY2016. This is a positive change, but USDA's explanatory notes to Congress state that \$5 million of this increased funding is dedicated solely to administrative costs, **not food dollars**.
- There is no question that FDPIR's administrative cost burden has increased, and the need to increase administrative funding for ITO's is not disputed. That \$5 million in funding for administrative costs is appreciated, and further questions associated with it are located elsewhere in the briefing document.
- However, food shortages have occurred in the recent past when similar levels of funding were allocated for food purchases. We are concerned that food shortages will happen again.
- We are also concerned that moving Alaska Villages into the program without a corresponding rise in funding for food and/or administrative costs will result in considerable food shortages across the country.
- Alaska Villages have been denied entry into the FDPIR before, with lack of funding being cited as the reason. There must be a plan for including Alaska villages due to their unique food access challenges.

Solutions:

- In other areas, such as with Indian Health Services and the Bureau of Indian Affairs, federal agencies enter into an established budget negotiating process with Tribes. Because FDPIR, like those programs, serves only Native people, a proactive consultation and budget negotiation process should also be undertaken here, so that Tribal leaders can meaningfully dialogue with FNS, the Office of Budget & Policy Analysis, and any other relevant USDA actors during the preparation of the proposed budget for FDPIR. If these budgetary requests were not a surprise to Tribal leaders, NAFDPIR, and ITO's, there would be far fewer questions about the process and hopefully more consensus. USDA, by failing to enter into meaningful consultation with Tribal leaders on issues central to budgetary support for the program miss an important opportunity to engage Tribes in assisting with Congressional conversations that could lead to adequate funding of the FDPIR program.

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- USDA should be seeking more funding for food dollars as well as administrative costs for FDPIR. This will help address food shortages for current participants and pave the way for Alaska Natives to enter the program as well.

Contingency Planning for Food Shortages

During the past few fiscal years, many ITO's have been plagued with food shortages. Shortages in the marketplace and shortages due to natural or man-made disasters have all played a part in contributing to a limited supply of food for FDPIR participants. The FDPIR food package has had periods where up to 30% of the 80 items on the approved food package ordering menu have been **absolutely unavailable** for ordering or unavailable in the national warehouse. At one point **all** meat proteins except one were unavailable. FNS has acknowledged their fault in this lack of food. However, measures should be taken now to plan for solutions to potential future problems. The important responsibility of feeding people requires that a jointly determined shortage/disaster response is negotiated because if such problems occur and the federal government is unable to perform its responsibilities, the communities served by FDPIR will turn to Tribal governments to respond. A viable contingency plan that is negotiated with the involvement of Tribal leaders is necessary, even if a shortage, government shut-down, or man-made or natural disaster never occurs.

Examples:

Problems with food shortages in FDPIR grew especially severe in 2014. This happened for several reasons:

1. First, there was an influx of new participants to the FDPIR as increased Recovery Act benefits for SNAP declined, ending in October 2013. In some cases, ITO's saw a 100% increase in their client numbers. FNS was entirely unprepared for this, even as ITOs consistently reported to regional and national personnel that they were seeing increased and sustained numbers of participants.
2. Coupled with this unanticipated rise in participation, there was a meat shortage throughout the country that impacted all feeding programs and the private sector.
3. In addition to new participants and a national meat shortage, ITO's had been forced to contend with a "lean warehouse policy" from their Regional FNS Offices, which meant that because of FNS policy, FDPIR warehouses kept a very limited stock on their shelves.
4. Together, these three events led to drastically reduced or completely unavailable stock for participants in 2014. **This should never happen again and plans should be in place to give confidence to ITOs that food will be available to participants.**

Solutions:

1. FNS must work with ITO's, NAFDPIR, and Tribal leaders to develop a contingency plan for food shortages. This plan must address better estimation and prediction of participation levels.
2. This plan must incorporate provisions that address how the program will continue to function normally even in disaster situations affecting the national food supply, whether manmade (as in the Animas River crisis) or natural (such as the California/Western US drought).
3. To the extent that USDA is able to reprogram SNAP dollars to address an influx of participation in FDPIR, as the agency has done in the past, FNS should explain those budgetary mechanisms now.

Traditional Foods

The fight to get traditional foods—any Tribe's traditional foods—into the food package has been ongoing for over a decade. Multiple surveys of FDPIR participants, conducted by the ITO's and NAFDPIR, bear out that Native people using FDPIR actively want more traditional foods in their monthly food package. Bison has always been high on the list of named foods that individuals would like to receive. Other traditional foods are also preferred by FDPIR participants. Surveys conducted by NAFDPIR have identified and isolated the types of traditional foods preferred and the amount of such foods that could be reasonably expected to be ordered on an annual basis.

FNS frequently cites legal barriers as the reason traditional foods cannot appear in the food package. The barriers they claim exist are:

- 1) "Special" appropriations must come from Congress to purchase traditional foods;
- 2) The FDPIR is a "national program that must address national tastes," and small companies cannot provide traditional foods in the amount USDA would have to purchase for a national food package.

These "barriers" are not actually barriers.

First, regarding the need for "special" appropriations: FNS has repeated this argument for years, completely ignoring the fact that several **traditional foods—including bison, wild rice, salmon, and blue corn, all of which are requested by FDPIR participants—are sold nationally in the commercial marketplace.** The presence of these foods in the commercial marketplace should signal to FNS that they need NO special language or special funding from Congress to purchase these foods for the FDPIR package. In fact:

1. NAFDPIR has contended for some time that **there is no specific language limiting FNS to purchasing traditional foods only from supplemental or special appropriations.**
2. NAFDPIR contends that **readily commercially available foods (such as bison, wild rice, blue corn, salmon, etc.) can be purchased as regular food purchases using base food purchase funding thereby eliminating the need to seek special permission from Congress to purchase traditional foods.**
3. Given the statutory authority to purchase traditional foods that has been place for multiple Farm bills and most recently reiterated by Congress, there is no reason why traditional foods which are available in the commercial marketplace should be interpreted out of existence in the package.

Second, regarding the "national program for national tastes" argument.

FNS has consistently contended that FDPIR is a "national program that must address national tastes" and have used this argument to require that any potential traditional foods vendor should be able to provide enough foods that ALL FDPIR program sites would have such foods available, regardless of whether the FDPIR participants in that region utilize the particular food in question as part of their traditional food preferences. **This is not required by the law enacting FDPIR and if that is the FNS policy, it can be changed.**

Further, two recent legal developments have proved FNS wrong with regards to this argument.

1. USDA received \$5 million in 2015 from Congress to purchase traditional foods. Those monies were used to purchase bison (from Native-owned company, KivaSun) and blue corn. Even though FNS consistently reports that small, Native-owned companies cannot fulfill a national demand for the food package, KivaSun has been able to prove this is not the case, and began delivering *nationally* on their contract in October 2015.
2. In 2014, the Farm Bill authorized \$2 million to purchase traditional foods, not for the national package, but on a regional or local scale. This would allow ITO's to put traditional foods from local, Native-owned companies, into their local food package. Congress has never actually appropriated the funds for this program, nor does it seem that USDA has requested them. Finally, this year, the President's budget for FY2017 requests that Congress fund this program.

The requested \$2 million is a good first step. However, it raises questions that should be addressed immediately.

Examples:

1. USDA's proposal indicates that this money will not be competitive—IOT's/Tribes will not be pitted against each other to receive it. However, if Congress does appropriate this \$2 million:
 - a. How does USDA/FNS plan to disburse these funds?
 - b. What will the criteria be to receive the funds?
 - c. What is the timeline for disbursement of the funds?
 - d. On what basis is USDA determining that the funds will be non-competitive? Will the funds be used to sole source the purchase?
2. Does this request for \$2 million in local/regional food mean that there will be no further purchasing of foods like bison for the national package? What will happen to the \$5m that FNS has repeatedly stated that is the limit of its ability to purchase traditional foods? Is that \$5m now in jeopardy? If so, why? Will the \$5m be lost and the \$2m now being suggested by FNS be the only available funding for traditional foods? **That is not acceptable. Both funding mechanisms are useful and appropriate means of getting traditional foods into the food package.**

Solutions:

- The above questions raised by the explanation above should be answered immediately and communicated to Tribal leaders as well as the NAFDPIR Board.
- Going forward, this is yet another area that could be helped by the standing up of a formal budget negotiation and consultation process.
- This is also another area where the Food Package Review Group could benefit from the addition of scientists. Grass-fed, natural bison, such as the kind provided right now by KivaSun, is an incredibly healthy product that should boost, not detract, from the

overall Healthy Eating Index score of the food package. The same holds true for several other readily commercially available traditional foods.

- A plan should be developed that makes traditional food vendors preferred vendors for the food package.
- If there is an unknown FNS policy that commercially available traditional foods like bison, wild rice, salmon, and blue corn cannot be purchased using base funding for food purchases, that policy needs to be changed.

Food Delivery Problems

Around the country, ITO's have experienced problems with food vendors delivering foods for the package that are in an unacceptable condition. These foods fall into two categories. The foods are either rotting and moldy, or are delivered so close to their Use-By dates that they cannot by law be given to participants, yet ITO's have no power to stop these deliveries from being made.

Examples:

- ITO's have no authority to terminate contracts with repeat offender vendors.
- ITO's have also been informed that they have no choice but to accept these deliveries of rotting and moldy foods or that they must accept an entire shipment and not a partial shipment which would leave the unacceptable foods with the vendor distributor.
- ITO's have also experienced either extremely slow to no movement after reporting these vendors to their Regional FNS offices.
- These problems were raised at the Tribal Leaders' meeting with FNS officials in Albuquerque in 2015.
- Officials remarked repeatedly that this is "not supposed" to happen, but there has been no plan to prevent it going forward. Integral to preventing this from happening is the institution of a fool-proof complaint mechanism that allows ITOs to file real-time complaints related to food deliveries with associated real-time action on the part of FNS to instruct vendors as to next steps. These failures of contractors to the federal government should not be borne by the beneficiaries and participants in FDIPIR.

Solutions:

- For repeat-offenders, some plan should be in place to terminate contracts.
- There should be a plan to ensure that all sub-par food deliveries are addressed by either a Regional or National FNS office immediately upon reporting but in no event any longer than within 2 weeks of being reported and documented by the ITO.
- FNS should commence regular reporting to NAFDPIR concerning contract termination of government contractors who repeatedly deliver sub-par foods.

Establishment of Permanent Tribal Leader Consultation Group

Because of the importance of the FDPIR to the most vulnerable members of Native communities, the reference to access to food in treaties between the federal government and Tribes, because the administration of this program will continue across many more executive administrations, and finally because of the importance of continuing a meaningful government-to-government relationship between Tribes and the USDA, we seek the establishment of a permanent consultation group to keep seeking solutions to the challenges faced by ITO's and FNS officials in regard to the FDPIR.

This is not a request for “listening sessions,” nor is this a request for a Federal Advisory Committee. This is a request for continued formal consultation, such as the kind undertaken today on February 23rd, 2016. This request is made under the color of the following legal authorities:

- Executive Order 13175;
- President Obama's Presidential Memorandum of November 2009;
- Office of Management & Budget regulations implementing EO 13175 and the subsequent PM; and
- USDA's own Departmental Regulation regulating Tribal Consultation enacted by Secretary Vilsack.

First steps for the establishment of ongoing tribal leader consultation group under EO 13175 and Departmental Regulation should be to:

- a. Determine core membership
- b. Determine meeting schedule

Other Items

The issues briefed above are the priority issues highlighted for discussion in the agenda for the February 23, 2016 meeting with USDA officials.

However, the issues briefed in this booklet are not the only challenges within the FDPIR. The NAFDPIR Board, and the ITO managers who have worked tirelessly for decades to improve their service to their FDPIR clients, face many other problems. Here, in brief, are other problems that an established Tribal Leader Consultation Group could help to solve in the future.

- Infrastructure needs for ITO sites.
 - Many FDPIR warehouses and facilities are in dire need of repairs.
 - It is unclear whether the \$5 million in additional administrative funding from the President's proposed FY2017 budget would help address these issues.
 - If so, the use of these funds for infrastructure needs will not alleviate the administrative burden on ITO's.
 - USDA's Rural Development (RD) department might be able to fix some of these basic infrastructure needs through their community development funding mechanisms.
 - Moving forward, the established Consultation Group could seek to dialogue with RD, or any other relevant USDA entity, to solve these problems without asking for additional appropriations or taking vital administrative funds away from the ITO managers who run the FDPIR.
- Reinstatement of the regional vendor pilot.
 - In the 2008 Farm Bill, Congress authorized and funded a "Regional Vendor Pilot" program for the FDPIR.
 - This regional approach allowed for significant increases in fresh fruits and vegetables for the food package.
 - Unfortunately, FNS cut the pilot short, said it was too expensive, and never shared any costs with ITO's.
 - The Pilot Tribe ITO's and the NAFDPIR might have been able to suggest creative cost-saving measures, but were never consulted.
 - This is yet another area where ongoing consultation and budget negotiation through a Tribal Leader Consultation Group could help stop problems for the FDPIR before they begin.
- Matching funds requirements.
 - Each ITO site must provide a 25% match to participate in the FDPIR.
 - If a site requests a waiver of this matching requirement, some sites are punished with a reduced budget. The budget is typically reduced by 25%, the amount that was supposedly waived.
 - This problem is regional and does not happen all over the country.
 - This inconsistency, along with other regional inconsistencies, must end.
- Carry forward policies.
 - Tribal program sites are not allowed to carry forward unused funds, even though State Agencies are allowed to do so.

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- Unused funds are not the fault of the ITO's, but are tied to delays in effective federal management decisions.
- ITO's should not be penalized for federal management failures, especially when States are not.
- If legal regulations do not allow ITO's to carry forward funds, FNS needs to work with Tribes to amend those regulations.
- Many times, fixing these regulations is as simple as inserting "and Tribes" or "and ITO's" into a sentence.
- FNS and the Office of Tribal Relations at USDA should work with the Tribal Leaders Consultation Group to make these important changes.
- Continuing FDPIR studies and evaluator contract awards.
 - The "nutrition paraprofessional" evaluation contract that FNS apparently awarded in FY2015 to an unknown contractor is not the only "study" or "evaluation" of this kind which has been undertaken in recent years.
 - While it is of course important for FNS to have accurate data on the program so that they can ask for appropriate levels of funding, continuing to award contracts to non-Native entities, or entities who have no familiarity whatsoever with the FDPIR or with Indian Country, is not helping to generate accurate data.
 - FNS has at least provided the NAFDPIR Board with an advance copy of an updated FDPIR study and requested comments and feedback. The Board will be providing this feedback just before this meeting commences. The Board urges FNS to take these comments into consideration and dialogue with the Board about them.

Appendix A: Acronyms & Abbreviations

- CDC: Centers for Disease Control
- EO: Executive Order
- FDPIR: Food Distribution Program on Indian Reservations
- FNS: Food & Nutrition Service
- FY: Fiscal Year
- ITO: Indian Tribal Organization
- NAFDPIR: National Association of Food Distribution Programs on Indian Reservations
- OBPA: Office of Budget & Policy Analysis
- RD: Rural Development
- SA: State Agency
- SNAP: Supplemental Nutrition Assistance Program (formerly Food Stamps)
- USDA: United States Department of Agriculture

Appendix B: Reports & Documents

1. Harper, E., Orbeta, R., Southworth, L., Meade, K., Cleveland, R., Gordon, S., & Hirschman, J. (2008). FDPIR food package nutritional quality: report to Congress. *US Department of Agriculture, Food and Nutrition Service, Office of Research and Analysis, Special Nutrition Programs Report FD-08-FDPIR*. Alexandria, VA: USDA November.
2. 2015 FDPIR ITO Managers Survey & Results.
3. Byker Shanks, C., et al., *Assessing Foods in the Food Distribution Program on Indian Reservations (FDPIR) Using the Healthy Eating Index 2010*, Public Health Nutrition, August 2015.
4. Excerpts of FDPIR-related OBPA reports.
5. Excerpts of the President's budget.
6. Excerpts of the 2014 Farm Bill.
7. NCAI Resolution ANC-14-054, *Call Upon Food & Nutrition Service to Remedy Food Shortages in the Food Distribution Program on Indian Reservations program and Purchase Traditional Foods for Food Package*.
8. Satterfield, D., et al., *Health Promotion & Diabetes Prevention in American Indian and Alaska Native Communities: Traditional Foods Project, 2008-2014*. CDC, Supplements, Feb. 12, 2016.
9. FDPIR Participant Food Survey & Results, July 2014.
10. Photos of rotten deliveries made to FDPIR ITO sites in 2014.
11. Executive Order 13175.
12. All correspondence with USDA and FNS from NAFDPIR and Tribal leadership to date.

Name _____

Title _____

ITO _____

Date _____

- 1) What is your age?
- 2) How long have you worked for the tribal FDPIR program?
- 3) How long has your Tribal FDPIR Manager managed the program?
- 4) When did you attend your last FDPIR training?
 - a. This Year
 - b. Last Year
 - c. Over two years
- 5) How long has your current FDPIR program been in its current location?
- 6) Is it a building where people can walk into? YES NO
- 7) Is your building accessible (are there wheelchair ramps, designated parking close to the building entrances, etc?) YES NO
- 8) Does your building need repairs? YES NO
- 9) If yes, what are the repairs needed?
- 10) Do you use the "tail gate" method of delivering food? YES NO
- 11) Do you use computers for your inventory or for any part of your program?

YES NO
- 12) If yes, when were they purchased?
- 13) How long have your freezers been in operation?

14) How long have your refrigerators been in operation?

15) From the following list, please circle the items that you have that are currently operational:

ROOF OF BUILDING

GENERATOR

FORKLIFT

COMMERCIAL REFRIGERATOR

COMMERCIAL FREEZER/COOLER

SECURITY SYSTEMS FOR BUILDING

SHELVING

PALLETS

INTERNET ACCESS

COMPUTERS

VEHICLES

COMMERCIAL KITCHEN

16) Are there any items on the list of items in #14 that you **don't** have? Please list those.

17) Are there any items on the list of items in #14 that you do have, but that need to be repaired or updated? Please list those and explain what is needed (repairs, replacements, etc).

Question 5 (Years)	Question 6	Question 7	Question 8	Question 9	Question 10
20+	Yes	Yes	Yes	Roof; Siding	Yes
Forever	Yes	No	No	n/a	No
33	Yes	Yes	Yes	Garage Doors	No
32	Yes	No	Yes	Outside, Handicap Walk	Yes
27	Yes	No	Yes	roof, parking lots, and entrance concrete	Yes
12	Yes	No	Yes	Better lighting outside, handicap ramp, paved parking	No
15	Yes	Yes	Yes	Roof, Walk-in cooler, freezers, renovations	Yes
40	Yes	Yes	Yes	HVAC system, electric system, floor repairs, bathroom repairs	Yes
18	Yes	Yes	Yes	Freezer, Cooler, Bay doors	Yes
20	Yes	Yes/No	Yes	Roof, stairs, outside appearance	Yes
27	Yes	Yes	Yes	Roof, gutters, cement cracked, drainage	Yes
34	Yes	Yes	Yes	Window, doors	Yes
6	Yes	Yes	No	n/a	No
33	Yes	Yes	Yes	Everything	Yes
6	Yes	Yes	No	n/a	No
31	Yes	No	Yes	Rust metal foundation, Drainage system.	No
8	Yes	No	Yes	Deck door, floor	No
25	Yes	Yes	Yes	Addition	No
11	Yes	Yes	Yes	New loading dock	No
6	Yes	Yes	No	n/a	No
7	Yes	Yes	No	n/a	Yes

35	Yes	No	Yes	Bathrooms, front office, whole building.	No
28	Yes	Yes	No	n/a	No
35	Yes	No	Yes	Roof, larger kitchen	No
Since it opened	Yes	Yes	Yes	Ceiling leaks, bathrooms.	No
21	Yes	Yes	Yes	Needs new duct work	No
32	Yes	Yes	No	n/a	Yes
10	Yes	Yes	No	n/a	No
28	Yes	Yes	Yes	roof	No
n/a	Yes	Yes	Yes	Wall leaks	No
12	Yes	Yes	Yes	New front door, facelif	No
30	Yes	Yes	Yes	floor refinish in warehouse, replacement freezer/refrigerator	Yes
28	Yes	Yes	No	n/a	No
36	Yes	No	No	n/a	Yes
8	Yes	Yes	No	n/a	Yes
32	Yes	Yes	Yes	Roof- Expansion	Yes
8	Yes	No	Yes	Floors	No
25	Yes	No	Yes	Need a fence, need a generator, handicap accessible	Yes
35	Yes	Yes	Yes	Roof	No
23	Yes	Yes	No	n/a	No
32	Yes	Yes	No	n/a	No
30	Yes	Yes	No	n/a	Yes
8	Yes	Yes	No	n/a	No
30	Yes	Yes	Yes	Paint, New carpet	Yes
20	Yes	No	Yes	Roof repair	No
31	Yes	No	Yes	Metal building due to rust and drainage problems	No

18	Yes	Yes	Yes	Generator, walk-in refrigerators, storage & door repairs	Yes
18	Yes	Yes	Yes	A lot, Getting a new building this year.	No
30	Yes	Yes	No	n/a	No
15+	Yes	Yes	No	n/a	No
Moved into a new building this year	Yes	Yes	Yes	Loading dock guard and canopy	Yes
38	Yes	Yes	No	n/a	No
30	Yes	Yes	No	n/a	Yes
32	Yes	Yes	Yes	Dropped ceiling or insulated walls, no insulation on exterior walls, heaters work too hard in the winter to keep building warm.	No
7	Yes	Yes	No	n/a	Yes
31	Yes	Yes	Yes	New floor, replace siding	Yes

Question 11	Question 12 (Years)	Question 13 (Years)	Question 14 (Years)	Roof of Building	Forklift	Commercial Freezer/Cooler
Yes	10	10	n/a			
Yes	20+	20+	20+		✓	✓
Yes	3 or 4	23	n/a			
Yes	4 or 5	20	n/a			
Yes	1	27	2009 and 1 for 27 years		✓	✓
Yes	3	12	n/a			
Yes	2 or 3	8+	8+		✓	✓
Yes	3	20+	20	✓	✓	✓
Yes	3	18	18	✓		
Yes	6	10	10+	✓	✓	✓
Yes	2	1 for 10, 1 for 4	4	✓	✓	✓
Yes	n/a	26	26		✓	✓
Yes	1 & 3	9 or 10	6 & 7	✓	✓	✓
Yes	2	5	32		✓	✓
Yes	n/a	6	6	✓	✓	✓
Yes	n/a	31	n/a			
Yes	11	15	2000, 1-2 years	✓	✓	✓
Yes	n/a	5	5 & 10	✓		✓
Yes	2	5	5	✓	✓	✓
Yes	4	6	6	✓	✓	✓
Yes	3	7	n/a			

Yes	7	10	n/a			
Yes	2	10+	10+	✓	✓	✓
Yes	2	10	5	✓	✓	✓
Yes	2	since opening	since program opened	✓	✓	✓
Yes	8	5 to 17	5 to 17	✓	✓	✓
Yes	3	5 & 1	5 & 1	✓	✓	✓
Yes	n/a	n/a	n/a	✓		
Yes	9	10	10	✓	✓	✓
Yes	4	New	n/a			
Yes	1	10+	10+	✓	✓	✓
Yes	2	1980's	1980's	✓	✓	✓
Yes	1	28	1-5 years, 1-28 years	✓	✓	✓
Yes	Through Tribal	25	25	✓	✓	✓
Yes	3	8	8	✓	✓	✓
Yes	3	3 to 32	3 to 32	✓	✓	✓
Yes	1	20 & 1	20	✓	✓	✓
Yes	10+	20+	20+	✓	✓	✓
Yes	6	15	15	✓	✓	✓
Yes	3	some older, some newer	some older, some newer	✓	✓	✓
Yes	3	since program start	35	✓	✓	✓
Yes	2	15	n/a			
Yes	n/a	2 to 8	n/a			
Yes	14	5	5	✓	✓	✓
Yes	2	15	20		✓	
Yes	This Year	31	30	✓	✓	✓

Yes	2	21 years total, 12 on current	21 years total, 12 on current	✓	✓	✓
Yes	5	18	18	✓	✓	✓
Yes	1	15	15	✓		✓
Yes	<5	15 & 10	10	✓	✓	✓
Yes	3 or 4	10	25	✓	✓	✓
Yes	3	1995	1980's	✓	✓	✓
Yes	1	25	3	✓	✓	✓
Yes	12	Chest freezer 4 years ago, others 10-12 years ago	6			✓
Yes	7	25	34	✓	✓	✓
Yes	7	7	7	✓	✓	✓

Security Systems for
Building

Shelving

Internet Access

Vehicles

Generator

Commercial Refrigerator

Pallets

✓

✓

✓

✓

✓

✓

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		✓	✓		✓	
		✓		✓	✓	✓
	✓	✓	✓		✓	✓
✓	✓	✓	✓	✓	✓	✓
	✓	✓	✓		✓	✓
	✓	✓	✓		✓	✓
		✓				✓
✓	✓	✓	✓		✓	✓
✓		✓	✓		✓	✓

Computers	Commercial Kitchen	Question 16
		n/a
✓	✓	n/a
		n/a
		n/a
✓		n/a
		n/a
✓	✓	Need roofing repair, new walk-in and freezer
✓	✓	Pallet Rack and Shelving
		Generator
✓		Shelving, Commercial Kitchen, Operating Security system
✓		Generator, shelving, commercial kitchen.
✓	✓	n/a
✓	✓	n/a
✓		Generator, Security, Shelving, Commercial kitchen
✓	✓	n/a
		n/a
✓		n/a
✓		Security system, forklift
✓		Security system, commercial kitchen.
✓	✓	n/a
		n/a

		n/a
✓		Commercial Kitchen
✓	✓	Generator, Security systems
✓		Generator
✓		Commercial Kitchen, Security system,
		vehicle
✓	✓	no
✓		Commercial freezer/cooler
✓		Generator
		n/a
✓		n/a
✓		Need an additional generator
✓		Commercial kitchen
✓		Commercial Kitchen
✓		n/a
✓	✓	None
✓		Commercial Kitchen
✓		Generator
✓	✓	n/a
✓	✓	n/a
✓	✓	n/a
		n/a
✓	✓	No
✓		Scanning equipment, scooters for handicap
✓	✓	n/a

✓		Commercial size generator, walk-in see through doors
✓	✓	Security system
✓	✓	n/a
✓		Generator, security system, and commercial kitchen.
✓	✓	Store Concept equipment, Large walk-in freezer
✓		Generator
✓		Commercial Kitchen, generator
✓		Delivery vehicle, backup generator
✓		Small kitchen
✓		Pallet shelving, Generator, commercial kitchen

Question 17

n/a

n/a

n/a

n/a

Roofing

n/a

roof: some leaks, walk-in old. Freezer: Small, Renovation.

Roof of building-leaks, forklift- upgrade, security system for building- need to extend, Internet access-Needs to upgrade.

Refrigerator/freezer, shelving, computers, forklift, vehicles.

Security system- replacement.

Need produce cases, forklifts, building needs repair, trucks need fixing.

Freezer/cooler, forklift

Need to expand freezer/cooler at satellite warehouse.

All 7, equipment, cooler, and freezer are old.

n/a

n/a

n/a

Computer

Roof of building, commercial refrigerator, Internet access, generator, forklift, commercial freezer/cooler, shelving, pallets, computers, vehicles.

n/a

n/a

n/a

Update computers

Roof- Leaks.

Roof of building

Computers need updated, larger generator, updating
freezer/coolers and pallets

no

Computers

Repair forklift

n/a

Walk in cooler,

Freezer/cooler,

Roof maintenance

Vehicle

n/a

Roof

n/a

Generator

Roof- driveway needs to be covered and resurfaced

maintenance

n/a

n/a

n/a

ü

Upgrade security system, Relocating to larger facility.

Zuni FDP needs larger generator

replacement refrigerators, replacement doors & floors,
awnings, storage building exterior building improvements.

n/a

n/a

no, all are working

all freezers need repairs, program vehicle needs repair or
replacement, computers updated, electric forklift, electric
pallet jacks

Loading dock

Replace truck

Computer updated and Internet access

updated computers, copy machine

Working faucets, repair roof leak, update computers, new
building.

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Assessing foods offered in the Food Distribution Program on Indian Reservations (FDPIR) using the Healthy Eating Index 2010

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Abstract

Objective: To assess the nutritional quality of food packages offered in the Food Distribution Program on Indian Reservations (FDPIR) using the Healthy Eating Index 2010 (HEI-2010).

Design: Data were collected from the list of the food products provided by the US Department of Agriculture's *Food and Nutrition Handbook 501 for FDPIR*. Nutritional quality was measured through a cross-sectional analysis of five randomly selected food packages offered through FDPIR. HEI-2010 component and total scores were calculated for each food package. ANOVA and *t* tests assessed significant differences between food packages and HEI-2010 maximum scores, respectively.

Setting: This study took place in the USA.

Subjects: Study units included food products offered through FDPIR.

Results: The mean total HEI-2010 score for the combined FDPIR food packages was significantly lower than the total HEI-2010 maximum score of 100 (66.38 (SD 11.60); $P < 0.01$). Mean scores for total fruit (3.52 (SD 0.73); $P < 0.05$), total vegetables (2.58 (SD 0.15); $P < 0.001$), greens and beans (0.92 (SD 1.00); $P < 0.001$), dairy (5.12 (SD 0.63); $P < 0.001$), total protein foods (4.14 (SD 0.56); $P < 0.05$) and refined grains (3.04 (SD 2.90); $P < 0.001$) were all significantly lower than the maximum values.

Conclusions: The FDPIR food package HEI-2010 score was notably higher than other federal food assistance and nutrition programmes. Study findings highlight opportunities for the FDPIR to modify its offerings to best support lifestyles towards prevention of diet-related chronic disease.

Keywords
American Indian
Diet
Nutrition
Food assistance
FDPIR
Food access

Overweight, obesity and nutrition-related chronic diseases are complex health conditions influenced by a number of biological, behavioural, environmental, genetic and personal factors⁽¹⁾. Improving access to nutrient-dense foods is one key strategy to prevent nutrition-related chronic disease and obesity^(2,3). In the USA, access to nutrient-dense foods is particularly a concern in communities with marked health disparities, including those that are rural, urban, of limited income or have high a percentage of minorities⁽⁴⁻⁹⁾.

For example, American Indians are more likely than the general US population to live in rural locations with limited food access⁽¹⁰⁾. At the same time, American Indian adults are 60% more likely to be obese than non-Hispanic whites⁽¹¹⁾. The consequences of obesity are well documented, including the risk of developing diabetes mellitus⁽¹²⁾, which is particularly concerning as American

Indian and Alaska Natives have a higher age-adjusted prevalence of diabetes mellitus than any other race or ethnic group in the USA⁽¹³⁾.

Previous research^(14,15) indicates that the modern American Indian diet is poor in nutrient quality and household food security is relatively low⁽¹⁵⁻¹⁷⁾. Emerging research indicates potential connections between diets poor in nutrient quality, high food insecurity rates and high obesity and chronic disease rates among American Indians^(18,19). Contemporary food issues observed within Native American populations have been connected to a long and storied history of colonialism and historical trauma⁽²⁰⁻²²⁾. With socio-economic, political and environmental changes including reduction in tribal land, end of nomadic lifestyles, shifts in farming policies, the near extinction of buffalo and limited rights to hunt, fish and collect wild foods, the current diet among American

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Indians has transitioned notably from traditional ways in post-colonial times^(23,24).

In effort to address nutrition-related challenges faced by American Indian peoples, the US government has supplied food to American Indians living on reservations for over 150 years as well as had a series of food-related agreements⁽¹⁴⁾. For example, some treaties included 'annuities' which granted hunting, fishing and gathering rights for American Indians⁽²⁵⁾. During the period circa 1860–1934, the government issued rations to supplement lost sources of wild foods and failed crops⁽²⁶⁾. However, some historical documents describe the rations provided by the government as being culturally inappropriate, inadequate, not delivered as promised and of low quality^(27,28).

The Food Distribution Program on Indian Reservations (FDPIR) was implemented by Congress in 1973 as part of the Consumer Protection Act⁽²⁹⁾. The Program states, 'many households participate in FDPIR as an alternative to the Supplemental Nutrition Assistance Program (SNAP), because they do not have easy access to SNAP offices or authorized food stores'⁽³⁰⁾.

Through FDPIR, the US Department of Agriculture (USDA) provides increased access to nutritious foods for low-income households living on Indian reservations and to American Indian families residing in designated areas near reservations⁽³⁰⁾. The FDPIR is one of sixteen distinct federal food assistance and nutrition programmes administered by the Food and Nutrition Service of the USDA⁽³¹⁾. The programme provides individuals an alternative to the Supplemental Nutrition Assistance Program (SNAP) enrolment by directly distributing commodity packages in communities and striving to meet basic nutrient needs of programme participants⁽³⁰⁾.

The USDA administers the FDPIR through either Indian Tribal Organizations (ITO) or an agency of a state government⁽³²⁾. The USDA purchases and ships FDPIR foods to the ITO and state agencies based on orders placed from a list of available foods⁽³²⁾. State agencies and ITO are responsible for determining applicant eligibility, storing and distributing the food, and providing nutrition education to recipients. According to the Program, 'Low-income American Indian and non-Indian households that reside on a reservation and households living in approved areas near a reservation or in Oklahoma that contain at least one person who is a member of a federally-recognized tribe, are eligible to participate in FDPIR'⁽³⁰⁾. Households may not participate in the FDPIR and SNAP in the same month⁽³²⁾. There currently are 276 tribes through 100 ITO and five state agencies receiving FDPIR benefits⁽³⁰⁾. Since the inception of the FDPIR, participant size has increased with a total 75 608 participants in 2013⁽³³⁾. Each month, participants select a food package based on their food preferences, household size and foods available at their particular ITO or state agency distribution site to help them maintain a nutritionally balanced diet⁽³²⁾.

In 2008, the *Special Nutrition Programs Report* no. FD-08-FDPIR was developed by the USDA to assess the

nutritional quality of FDPIR foods utilizing the Healthy Eating Index 2005 (HEI-2005)⁽³⁴⁾. Results from the report indicated that FDPIR had the potential to provide participants with a diet of higher nutrient quality than the average American or SNAP participant.

To the best of the authors' knowledge, the Healthy Eating Index 2010 (HEI-2010)⁽³⁵⁾ has yet to be utilized in assessing the nutritional quality of foods offered as part of FDPIR. The HEI-2010⁽³⁵⁾ has been developed to measure adherence to the most recently published federal dietary guidelines, the 2010 Dietary Guidelines for Americans (DGA)⁽³⁶⁾, whereas HEI-2005 was developed to measure the previous version of the federal dietary guidelines, the 2005 Dietary Guidelines for Americans (2005 DGA)^(35,37). Specifically, HEI-2010 updates include: (i) emphasis on Dark Green Vegetables and Beans and Peas; (ii) a Seafood and Plant Proteins component was introduced; (iii) Fatty Acids replaces the Oils and Saturated Fats components; and (iv) Refined Grains (a moderation component) replaced Total Grains (an adequacy component)⁽³⁵⁾.

It is important to assess the nutritional quality of FDPIR foods utilizing the HEI-2010 to understand how each iteration of current dietary guidance is reflected within the offerings of the food assistance programme. For example, dark green vegetables and beans and peas are two vegetable subgroups for which intakes are furthest from recommended levels and the category of 'vegetables and soup' allows for choices among many vegetables; the introduction of seafood and plant proteins within HEI-2010 allows for capturing the dietary contribution of more specific protein choices within the broad 'meat, poultry, fish, beans, eggs and nuts' category of FDPIR; replacing saturated fats with fatty acids within HEI-2010 allows for the more specific assessment of the value of vegetable oil, light buttery spread and butter within the 'oil' category of FDPIR; refined and whole grains are both offered within the FDPIR 'grains, cereal, rice and pasta' category and assessing these separately with HEI-2010 is important to understand their distinct dietary contributions^(38,39).

The sum of the scores for the twelve components is the total HEI-2010 score, which ranges from 0 to 100, with a higher score indicative of a more healthful diet. HEI-2010 is composed of twelve components, nine that focus on nutritional adequacy and three that apply nutritional moderation⁽⁴⁰⁾. For HEI-2010, Refined Grains, Sodium and Empty Calories are all moderation components. A higher score within moderation components indicates lower availability of the food in the diet. All other categories are adequacy components, where a higher score indicates higher availability of food in the diet. HEI-2010 scores separate diet quality from quantity by using standards that are expressed as a percentage of energy, per 1000 kcal (4184 kJ) or a ratio of fatty acids⁽⁴⁰⁾.

The lack of assessment of the FDPIR with the HEI-2010 presents a knowledge gap regarding the dietary quality of FDPIR foods that support American Indian households in



compliance with the 2010 DGA. Current nutrition research is needed in order to develop appropriate nutritional planning and policies related to food assistance, food security and obesity in tribal communities with marked health disparities. The purpose of the current research was to assess the nutritional quality of foods offered in the FDPIR using HEI-2010.

Experimental methods

Data were collected from a list of the food products found in Exhibit O of the *Food and Nutrition Handbook 501 for FDPIR*, which was effective as of September 2013⁽³²⁾. The study was exempt from Institutional Review Board review since no information was collected from human subjects.

Data analysis

Each food option was entered into the USDA What's In The Foods You Eat online search tool (version 5.0)⁽⁴¹⁾. Matching food package components and search tool foods was based on the item description and nutrient profiles. Each food item was assigned a USDA food code and nutrient composition was ascertained (Table 1). Food group composition was determined using the MyPyramid Equivalents Database for USDA Survey Food Codes, 2003–2004 (version 2). Each food listed in FDPIR, including foods requiring preparation (e.g. flour) and the few available ready-to-eat options, can be found in the cited database⁽⁴¹⁾.

The researchers simulated five possible food package scenarios for analysis by (i) using the FDPIR guide to establish the maximum allowed number of items for a one-person household⁽³⁹⁾ and then (ii) randomly selecting the maximum allowed number of items per USDA food group ('grains, cereal, rice and pasta'; 'vegetables and soup'; 'fruit and juice'; 'meat, poultry, fish, beans, eggs and nuts'; 'milk and cheese'; 'oil'). The FDPIR guide outlines requirements for the number of items that can be chosen based on the number of people in a household per month for each food item⁽³⁹⁾. The number of items that can be chosen is often increased linearly per person (e.g. 1 person = 1 item, 2 persons = 2 items, 3 persons = 3 items, etc.). Analysis was based on a one-person household with the expectation that the dietary quality would remain consistent with increasing number of persons in a household. For each food package, a random number generator was utilized to randomly select from all options per USDA food group. Randomly generated options were allowed to be chosen more than once when FDPIR guidelines allowed for greater than one option per USDA food group.

Using randomly generated food packages, HEI-2010 component and total scores were calculated using published SAS code (version 9.2), modified to assess this specific data set⁽⁴²⁾. Prior to analysis, ANOVA was used to detect if the criteria for randomly selecting food packages

used in the present study could lead to significant differences in key nutrient content across each of the five food packages. No significant differences were found among total energy, carbohydrates (g), saturated fat (g) and Na (mg) for each of the five food packages.

Following the methodology outlined by Erinoshio and colleagues⁽⁴³⁾, means and standard deviations were calculated to generate both HEI-2010 component scores and total scores across all menus. The *t* test was calculated to assess whether mean HEI-2010 component scores and total scores differed significantly ($P < 0.05$) from the maximum scores.

Results

Table 2 describes HEI-2010 component scores and total scores for foods and beverages provided as part of the five randomly generated FDPIR food packages. The mean total HEI-2010 score for the combined FDPIR food packages was significantly lower than the total HEI-2010 maximum score of 100 (66.38 (SD 11.60); $P < 0.01$), with total HEI-2010 scores ranging from 49.50 to 79.50 across all five FDPIR food packages. Mean scores for Total Fruit (3.52 (SD 0.73); $P < 0.05$), Total Vegetables (2.58 (SD 0.15); $P < 0.001$), Greens and Beans (0.92 (SD 1.00); $P < 0.001$), Dairy (5.12 (SD 0.63); $P < 0.001$), Total Protein Foods (4.14 (SD 0.56); $P < 0.05$) and Refined Grains (3.04 (SD 2.90); $P < 0.01$) were all significantly lower than the maximum values (of 5, 5, 5, 10, 5 and 10, respectively). All other components did not demonstrate significant differences from their maximum values.

Contributing to the combined FDPIR HEI-2010 score, all five food packages (100 %) met the standard for a maximum value for Empty Calories, followed by three (60 %) that met the standard for Whole Grains, three (60 %) that met the standard for Seafood and Plant Proteins, two (40 %) that met the standard for Whole Fruit and one (20 %) that met the standard for Fatty Acids. No sample food packages met the standard for a maximum value for Total Fruit, Total Vegetables, Greens and Beans, Dairy, Total Protein Foods, Refined Grains or Sodium.

Discussion

The present study addresses an important knowledge gap by characterizing the mean nutritional quality of five randomly generated food packages of the FDPIR on the basis of the most recently published federal dietary guidelines, the 2010 DGA. The FDPIR packages are not meeting the diet quality recommendations outlined by the 2010 DGA, as our analysis found significantly lower HEI-2010 overall score compared with the maximum score.

Similar to our findings, Americans do not consume adequate amounts of fruits, vegetables, whole grains or dairy and significantly lower HEI-2010 component scores compared with the maximum values from 2010 DGA were

**Table 1** USDA food codes and foods for five sample monthly FDIPIR food packages

Food package, food group and USDA food code	Grams per food item	Food item
Food Package 1		
Grains, cereal, rice and pasta		
57134000	400	Corn flakes, NFS
56206990	2744	Wheat, cream of, cooked, NS as to regular, quick or instant, NS as to fat added in cooking
56101000	1248	Macaroni, cooked, NS as to fat added in cooking (×2)
56112000	1184	Noodles, cooked, NS as to fat added in cooking
56205330	2880	Rice, white and wild, cooked, NS as to fat added in cooking
50020000	2250	Flour, whole wheat (×2)
50010000	2250	Flour, white (×0.25)
54325000	453	Crackers, saltine
Vegetables and soup		
73102203	440	Carrots, cooked, from canned, NS as to fat added in cooking
75216050	440	Corn, NS as to form, NS as to colour, cream style
73201003	440	Pumpkin, cooked, from canned, NS as to fat added in cooking
73101010	488	Carrots, raw
75117020	440	Onions, mature, raw
73401000	238	Sweet potato, NFS
75103000	908	Cabbage, green, raw
75125000	416	Radish, raw
75109600	429	Corn, raw
74101000	300.2	Tomatoes, raw
75122100	357	Pepper, sweet, green, raw
28315100	720	Beef vegetable soup with potato, stew type (×2)
74601000	320.2	Tomato soup, NFS
Fruit and juice		
63101000	546	Apple, raw (×2)
61101010	512	Grapefruit, raw (×2)
63137010	534	Pear, raw
63127010	640	Honeydew melon, raw
63126500	414	Kiwi fruit, raw
63143010	198	Plum, raw
62122100	387.5	Prune, dried, uncooked
64104010	1984	Apple juice
61201220	1977.6	Grapefruit juice, canned, bottled or in a carton
Meat, poultry, fish, beans, eggs and nuts		
21500000	453.6	Ground beef, raw
23326100	352	Bison, cooked
21401000	704	Beef, roast, roasted, NS as to fat eaten
22311000	368	Ham, smoked or cured, cooked, NS as to fat eaten
41106000	279	Red kidney beans, dry, cooked, NS as to fat added in cooking
41205010	447.6	Refried beans (×2)
41104000	310	Pinto, calico or red Mexican beans, dry, cooked, NS as to fat added in cooking
33102010	360	Scrambled egg, made from powdered mixture (×2)
42501000	420	Nut mixture with dried fruit and seeds
Milk and cheese		
14410200	2268	Cheese, processed, American or Cheddar type (×0.5)
11212050	384	Milk, evaporated, skimmed (formerly NS as to dilution, used in coffee or tea) (×4)
11112210	976	Milk, cow's, fluid, 1 % fat (×4)
Oil		
82101000	1308	Vegetable oil, NFS
Food Package 2		
Grains, cereal, rice and pasta		
57207000	400	Bran flakes, NFS (formerly 40 % bran flakes, NFS)
57602100	1200	Oats, raw
58145110	200	Macaroni or noodles with cheese (×3)
56101000	1248	Macaroni, cooked, NS as to fat added in cooking
56102000	1248	Macaroni, whole wheat, cooked, NS as to fat added in cooking
56205330	2880	Rice, white and wild, cooked, NS as to fat added in cooking
56201510	14 640	Cornmeal mush, made with water
50020000	2250	Flour, whole wheat
50010000	2250	Flour, white (×0.25)
54325000	453	Crackers, saltine
Vegetables and soup		
56200990	440	Grits, cooked, corn or hominy, NS as to regular, quick or instant, NS as to fat added in cooking
74404010	440	Spaghetti sauce, meatless
73101010	488	Carrots, raw
71000100	334	White potato, NFS

**Table 1** *Continued*

Food package, food group and USDA food code	Grams per food item	Food item
73302010	280	Squash, winter type, raw
75128000	392	Squash, summer, yellow, raw
73401000	238	Sweet potato, NFS
75103000	908	Cabbage, green, raw (x2)
75109000	400	Celery, raw
75111000	402	Cucumber, raw
75607030	305	Mushroom soup, canned, undiluted (x3)
Fruit and juice		
63311110	437.9	Fruit cocktail, cooked or canned, NS as to sweetened or unsweetened; sweetened, NS as to type of sweetener (x2)
63105010	402	Avocado, raw
63311050	440	Fruit salad, fresh or raw, (including citrus fruits), no dressing
63123000	377.5	Grapes, raw, NS as to type (x3)
63126500	414	Kiwi fruit, raw
63143010	198	Plum, raw
62122100	387.5	Prune, dried, uncooked
64116020	1996.8	Grape juice
61210000	1990.4	Orange juice, NFS
Meat, poultry, fish, beans, eggs and nuts		
24198570	600	Chicken, canned, meat only
23326100	352	Bison, cooked
24201310	960	Turkey, light and dark meat, roasted, NS as to skin eaten
22311000	368	Ham, smoked or cured, cooked, NS as to fat eaten
41101100	2240	White beans, dry, cooked, NS as to fat added in cooking
33102010	360	Scrambled egg, made from powdered mixture (x2)
42501000	420	Nut mixture with dried fruit and seeds
Milk and cheese		
14410200	2268	Cheese, processed, American or Cheddar type (x0.5)
11212050	384	Milk, evaporated, skimmed (formerly NS as to dilution, used in coffee or tea) (x4)
11121300	2587.2	Milk, dry, reconstituted, non-fat (x0.5)
Oil		
82101000	1308	Vegetable oil, NFS
Food Package 3		
Grains, cereal, rice and pasta		
57000100	400	Oat cereal, NFS
56206990	2744	Wheat, cream of, cooked, NS as to regular, quick or instant, NS as to fat added in cooking
58145110	200	Macaroni or noodles with cheese (x3)
56112000	1184	Noodles, cooked, NS as to fat added in cooking (x2)
56205330	2880	Rice, white and wild, cooked, NS as to fat added in cooking
56201510	14 640	Cornmeal mush, made with water
50010000	2250	Flour, white
50010000	2250	Flour, white (x0.25)
54325000	453	Crackers, saltine
Vegetables and soup		
75216050	440	Corn, NS as to form, NS as to colour, cream style
71501300	440	White potato, from dry, mashed, NS as to milk or fat (x2)
74404010	440	Spaghetti sauce, meatless
73201003	440	Pumpkin, cooked, from canned, NS as to fat added in cooking
73101010	400	Carrots, raw
75129000	366	Turnip, raw
75103000	908	Cabbage, green, raw
75102750	416	Brussels sprouts, raw
72116000	376	Endive, chicory, escarole or romaine lettuce, raw
74101000	300.2	Tomatoes, raw
28315100	720	Beef vegetable soup with potato, stew type
74601000	320.2	Tomato soup, NFS (x2)
Fruit and juice		
63103110	425	Apricot, cooked or canned, NS as to sweetened or unsweetened; sweetened, NS as to type of sweetener
63137110	437.9	Pear, cooked or canned, NS as to sweetened or unsweetened; sweetened, NS as to type of sweetener
63105010	402	Avocado, raw
61119010	393	Orange, raw
63135010	450	Peach, raw
63123000	377.5	Grapes, raw, NS as to type (x2)
63127010	640	Honeydew melon, raw
63131010	408	Nectarine, raw

Table 1 *Continued*

Food package, food group and USDA food code	Grams per food item	Food item
62125100	439.4	Raisins
64116020	1996.8	Grape juice
61210000	1990.4	Orange juice, NFS
Meat, poultry, fish, beans, eggs and nuts		
21500000	453.6	Ground beef, raw
23326100	352	Bison, cooked
24100000	1152	Chicken, NS as to part and cooking method, NS as to skin eaten
22311000	368	Ham, smoked or cured, cooked, NS as to fat eaten
41205010	447.6	Refried beans
41102000	342.9	Black, brown or bayo beans, dry, cooked, NS as to fat added in cooking
41104000	310	Pinto, calico or red Mexican beans, dry, cooked, NS as to fat added in cooking (x2)
33102010	360	Scrambled egg, made from powdered mixture (x2)
42202000	256	Peanut butter
Milk and cheese		
14410200	2268	Cheese, processed, American or Cheddar type (x0.5)
11212050	384	Milk, evaporated, skimmed (formerly NS as to dilution, used in coffee or tea) (x4)
11121300	2587.2	Milk, dry, reconstituted, non-fat (x0.5)
Oil		
81104010	425	Margarine-like spread, reduced calorie, about 40 % fat, tub, salted (x2)
Food Package 4		
Grains, cereal, rice and pasta		
57207000	400	Bran flakes, NFS (formerly 40 % bran flakes, NFS)
57602100	1200	Oats, raw
56101000	1248	Macaroni, cooked, NS as to fat added in cooking
56102000	1248	Macaroni, whole wheat, cooked, NS as to fat added in cooking (x2)
56205330	2880	Rice, white and wild, cooked, NS as to fat added in cooking
56201510	14 640	Cornmeal mush, made with water
50010000	2250	Flour, white
50010000	2250	Flour, white (x0.25)
54325000	453	Crackers, saltine
Vegetables and soup		
56200990	440	Grits, cooked, corn or hominy, NS as to regular, quick or instant, NS as to fat added in cooking
75224013	440	Peas, green, cooked, from canned, NS as to fat added in cooking
72125203	440	Spinach, cooked, from canned, NS as to fat added in cooking
71501300	440	White potato, from dry, mashed, NS as to milk or fat
73101010	400	Carrots, raw (x2)
71000100	334	White potato, NFS
75102750	416	Brussels sprouts, raw
72116000	376	Endive, chicory, escarole or romaine lettuce, raw
74101000	298	Tomatoes, raw
74101000	300.2	Tomatoes, raw
28315100	720	Beef vegetable soup with potato, stew type (x2)
74601000	320.2	Tomato soup, NFS
Fruit and juice		
63101110	437.9	Applesauce, stewed apples, NS as to sweetened or unsweetened; sweetened, NS as to type of sweetener (x2)
63103110	425	Apricot, cooked or canned, NS as to sweetened or unsweetened; sweetened, NS as to type of sweetener (x2)
63311110	437.9	Fruit cocktail, cooked or canned, NS as to sweetened or unsweetened; sweetened, NS as to type of sweetener
61101010	512	Grapefruit, raw
63137010	534	Pear, raw
63135010	450	Peach, raw
63127010	640	Honeydew melon, raw
63131010	408	Nectarine, raw
64116020	1996.8	Grape juice
74301100	1945.6	Tomato juice
Meat, poultry, fish, beans, eggs and nuts		
22101000	336	Pork chop, NS as to cooking method, NS as to fat eaten (x2)
21401000	704	Beef, roast, roasted, NS as to fat eaten
22311000	368	Ham, smoked or cured, cooked, NS as to fat eaten
41201020	492.1	Baked beans, vegetarian
41205010	447.6	Refried beans
41104000	310	Pinto, calico or red Mexican beans, dry, cooked, NS as to fat added in cooking (x2)
33102010	360	Scrambled egg, made from powdered mixture (x2)
42202000	256	Peanut butter

**Table 1** *Continued*

Food package, food group and USDA food code	Grams per food item	Food item
Milk and cheese		
14410200	2268	Cheese, processed, American or Cheddar type (x0.5)
11212050	384	Milk, evaporated, skimmed (formerly NS as to dilution, used in coffee or tea) (x4)
11112210	976	Milk, cow's, fluid, 1 % fat (x4)
Oil		
82101000	1308	Vegetable oil, NFS
Food Package 5		
Grains, cereal, rice and pasta		
57148500	400	Crispy brown rice cereal
57602100	1200	Oats, raw
58145110	200	Macaroni or noodles with cheese (x3)
56102000	1248	Macaroni, whole wheat, cooked, NS as to fat added in cooking
56112000	1184	Noodles, cooked, NS as to fat added in cooking (x2)
56201510	14 640	Cornmeal mush, made with water
50020000	2250	Flour, whole wheat
50010000	2250	Flour, white (x0.25)
54325000	453	Crackers, saltine
Vegetables and soup		
73102203	440	Carrots, cooked, from canned, NS as to fat added in cooking
75216050	440	Corn, NS as to form, NS as to colour, cream style
72125203	440	Spinach, cooked, from canned, NS as to fat added in cooking
75311003	440	Mixed vegetables (corn, lima beans, peas, green beans and carrots), cooked, from canned, NS as to fat added in cooking (x2)
74204500	440	Tomatoes, canned, low sodium
71000100	501	White potato, NFS
75129000	366	Turnip, raw
75102750	416	Brussels sprouts, raw
75109600	429	Corn, raw
75122100	357	Pepper, sweet, green, raw
28315100	720	Beef vegetable soup with potato, stew type (x2)
75654020	298	Vegetarian vegetable soup, undiluted
Fruit and juice		
63103110	425	Apricot, cooked or canned, NS as to sweetened or unsweetened; sweetened, NS as to type of sweetener
63135110	437.9	Peach, cooked or canned, NS as to sweetened or unsweetened; sweetened, NS as to type of sweetener
63137110	437.9	Pear, cooked or canned, NS as to sweetened or unsweetened; sweetened, NS as to type of sweetener
63311110	437.9	Fruit cocktail, cooked or canned, NS as to sweetened or unsweetened; sweetened, NS as to type of sweetener
63137010	534	Pear, raw (x2)
63135010	450	Peach, raw
63126500	414	Kiwi fruit, raw
62122100	387.5	Prune, dried, uncooked
61201220	1977.6	Grapefruit juice, canned, bottled or in a carton
74301100	1945.6	Tomato juice
Meat, poultry, fish, beans, eggs and nuts		
21500000	453.6	Ground beef, raw
24100000	1152	Chicken, NS as to part and cooking method, NS as to skin eaten
21401000	704	Beef, roast, roasted, NS as to fat eaten
22311000	368	Ham, smoked or cured, cooked, NS as to fat eaten
41106000	279	Red kidney beans, dry, cooked, NS as to fat added in cooking (x2)
41102000	342.9	Black, brown or bayo beans, dry, cooked, NS as to fat added in cooking
41104000	310	Pinto, calico or red Mexican beans, dry, cooked, NS as to fat added in cooking
33102010	360	Scrambled egg, made from powdered mixture (x2)
42111110	453.6	Peanuts, roasted, without salt
Milk and cheese		
14410200	2268	Cheese, processed, American or Cheddar type (x0.5)
11212050	384	Milk, evaporated, skimmed (formerly NS as to dilution, used in coffee or tea) (x4)
11112210	976	Milk, cow's, fluid, 1 % fat (x4)
Oil		
81100500	454	Butter, NFS

USDA, US Department of Agriculture; FDPIR, Food Distribution Program on Indian Reservations; NFS, not further specified; NS, not specified.

**Table 2** HEI-2010† component and total scores for each of the five sample FDPIR monthly food packages (*n* 5)

Component	Maximum value	Standard for maximum score	Standard for minimum score of zero	Mean	SD	Range	% Meeting maximum value‡	<i>n</i>
Total Fruit§	5	≥0.8 cup equivalent per 1000 kcal	No Fruit	3.52*	0.73	2.60–4.40	0	0
Whole Fruit	5	≥0.4 cup equivalent per 1000 kcal	No Whole Fruit	4.60	0.52	3.90–5.00	40.0	2
Total Vegetables¶	5	≥1.1 cup equivalents per 1000 kcal	No Vegetables	2.58***	0.15	2.40–2.80	0	0
Greens and Beans¶	5	≥0.2 cup equivalent per 1000 kcal	No Dark Green Vegetables or Beans and Peas	0.92***	1.00	0.00–2.20	0	0
Whole Grains	10	≥1.5 oz equivalents per 1000 kcal	No Whole Grains	7.88	3.68	1.50–10.00	60.0	3
Dairy††	10	≥1.3 cup equivalents per 1000 kcal	No Dairy	5.12***	0.63	4.20–5.70	0	0
Total Protein Foods‡‡	5	≥2.5 oz equivalents per 1000 kcal	No Protein Foods	4.14*	0.56	3.30–4.80	0	0
Seafood and Plant Proteins‡‡,§§	5	≥0.8 oz equivalent per 1000 kcal	No Seafood or Plant Proteins	4.64	0.53	3.80–5.00	60.0	3
Fatty Acids	10	(PUFA + MUFA)/SFA > 2.5	(PUFA + MUFA)/SFA ≤ 1.2	4.80	4.55	0.00–10.00	20.0	1
Refined Grains	10	≤1.8 oz equivalents per 1000 kcal	≥4.3 oz equivalents per 1000 kcal	3.04**	2.90	0.00–6.40	0	0
Sodium	10	≤1.1 g per 1000 kcal	≥2.0 g per 1000 kcal	5.08*	3.15	0.70–9.30	0	0
Empty Calories¶¶	20	≤19 % of energy	≥50 % of energy	20.00	0	20.00–20.00	100.0	5
Total	100			66.38**	11.60	49.50–79.50	–	

HEI-2010, Healthy Eating Index-2010; FDPIR, Food Distribution Program on Indian Reservations.

1000 kcal = 4184 kJ.

P* < 0.05; *P* < 0.01; ****P* < 0.001.

†Intakes between the minimum and maximum standards are scored proportionately.

‡Includes the five sample monthly food packages.

§Includes fruit juice.

||Includes all forms except juice.

¶Includes any beans and peas not counted as Total Protein Foods.

††Includes all milk products, such as fluid milk, yoghurt and cheese, and fortified soya beverages.

‡‡Beans and peas are included here (and not with vegetables) when the Total Protein Foods standard is otherwise not met.

§§Includes seafood, nuts, seeds, soya products (other than beverages) as well as beans and peas counted as Total Protein Foods.

||||Ratio of PUFA and MUFA to SFA.

¶¶Calories from solid fats, alcohol and added sugars; threshold for counting alcohol is >13 g/1000 kcal.

found for Total Fruit, Total Vegetables, Greens and Beans, Dairy, Refined Grains, Total Protein Foods and Protein⁽³⁶⁾. The current study shows that, although there was no significant difference, the HEI-2010 scores for Whole Fruit, Whole Grains, Seafood and Plant Proteins and Fatty Acids also fell short of the maximum HEI-2010 score, indicating a potential need to improve options within these categories. Although the HEI-2010 mean total score for FDPIR (score of 66) was slightly better than the American food supply (HEI-2005 score of 55)⁽⁴⁴⁾, the FDPIR should target providing more inadequately consumed foods (of fruits, vegetables, whole grains or dairy) to promote better nutrition among participants in line with the needs of the American population.

Interestingly, HEI-2010 scores of each of the five assessed food packages show significant variation in nutritional quality and thereby emphasize the role of FDPIR centres in providing more foods that are consistent with adequacy components and fewer foods categorized as moderation components by HEI-2010⁽³⁸⁾. Secondly, consumer behaviour in making dietary choices from available food access should also be considered. Findings

from the present study highlight opportunities to provide guidance to FDPIR participants about nutritionally balanced food choices at FDPIR centres as well as foods that participants acquire outside the FDPIR. The FDPIR should ideally provide participants with the opportunity to increase diet quality beyond the average American diet as well as meet the current DGA⁽³⁶⁾. The FDPIR is positioned to modify its food and education offerings to best support lifestyles towards prevention of diet-related chronic disease.

The HEI-2010 FDPIR score from the current research (score of 66) resulted to be lower than a previous assessment of FDPIR that utilized HEI-2005 (score of 87)⁽³⁴⁾. Although methodologies between FDPIR assessments differed, it is important to explore the differences found using the two versions of the Healthy Eating Index, which reflects the most up-to-date dietary guidance. The current assessment offered similar scores for Total Fruit, Whole Fruit, Total Vegetables, Greens and Beans (previously Dark Green and Orange Vegetables and Legumes), Dairy (previously Milk) and Empty Calories compared with the previous assessment⁽³⁴⁾. Differences in



scores between the two assessments can be attributed partially to foods selected in the food packages and partially to updates in scoring. For example, in the previous assessment that used HEI-2005, the component of Total Grains received a maximum score of 5, while the current assessment for Whole Grains resulted in a score lower than the maximum (8 out of 10) and Refined Grains resulted in score significantly lower than the maximum (3 out of 10)⁽³⁴⁾. Grain foods randomly selected for the current assessment were split into the updated categories of Refined Grains and Whole Grains. Grain foods in the previous assessment were placed in the Total Grains category. In one additional example, the component of Oils and Saturated Fats scored relatively close to the maximum in the HEI-2005 analysis (9.8 out of 10), while in the current assessment Fatty Acids scored relatively low (4.8 out of 10)⁽³⁴⁾. This is in part due to the replacement of the Oils and Saturated Fats component with Fatty Acids in the HEI-2010. Improvements in the Refined Grain, Whole Grain and Fatty Acids categories are warranted. Although changes in national dietary guidance are usually minimal, these examples demonstrate the importance of assessing nutrition quality of FDPIR foods using new iterations of the Healthy Eating Index to capture important nuances in diet quality.

The HEI-2010 mean total score for FDPIR cannot be compared with other HEI-2010 scores in different food assistance contexts, as these analyses do not currently exist. Although there are limitations to comparing HEI-2005 and HEI-2010, the nutrient quality of the current FDPIR food packages using the HEI-2010 analysis is higher than of some other federal food assistance and nutrition programmes, including comparison to dietary intake of SNAP⁽³⁴⁾ and Special Supplemental Nutrition Program for Women, Infants, and Children (WIC)⁽⁴⁵⁾ participants using HEI-2005. Comparison of the FDPIR nutrient quality with SNAP and non-SNAP participants' dietary intake shows that the FDPIR has higher scores. These findings may be in part due to the analysis of actual participant dietary intake in SNAP and WIC, whereas the analysis in the current study measured nutrient quality of randomized food packages. Researchers working with the FDPIR should analyse dietary intake of FDPIR participants to understand the value of what nutrients are consumed in addition to the nutrient value of food package offerings. Specifically, the dietary intake of SNAP participants was found to have a HEI-2005 total score of 47 and non-participants were found to have a total score 51⁽⁴⁶⁾, which is considerably lower than the average HEI-2010 mean score of 66 found in the present study for the nutrient quality of FDPIR packages. Furthermore, dietary intake of child participants in the WIC received a HEI-2005 total score of 58, compared with dietary intake of children not participating in WIC who received a score of 60⁽⁴⁵⁾, which are both lower than the mean nutrient quality score for the FDPIR food packages. The differences in findings may also

be due to greater access to processed and sugar-added foods of SNAP compared with the FDPIR and lack of dietary analysis of intake of FDPIR participants. In contrast to SNAP where benefits can be used by participants to purchase 'foods of minimal nutritional value' including soda, water ices, chewing gum and candy, foods in the FDPIR package are selected to address some nutritional need⁽⁴⁷⁾. Participants in the FDPIR may also supplement their diet with purchased processed and sugar-added foods or other foods (e.g. hunted, grown, gathered), but the current analysis does not account for dietary intake.

The FDPIR still has nutritional shortcomings that need to be addressed in order to decrease the risk of diet-related chronic disease on American Indian reservations. In our current study and other observational work in progress, shortcomings of the FDPIR may derive from limited offerings of greens and total vegetables, nutrient profile of foods, sensory appeal of individual FDPIR offerings and the physical environment of the FDPIR centre, time needed to prepare FDPIR foods *v.* convenience foods, and lack of knowledge in preparing FDPIR foods. These issues are germane to improving diet quality of programme participants.

Increasing offerings of vegetables may require an increase in the budget allocated to the FDPIR if other aspects of the programme are to remain unchanged, given the relatively high price of produce in the USA compared with non-specialty crops. Modifying the structure of the FDPIR to offer greater selection of fresh fruits and vegetables may encourage produce consumption, particularly if this offering was coupled with nutrition information and cooking demonstrations on preparing recipes that are culturally compatible. In recent years, the quality of FDPIR food has been improved by the Fresh Fruits and Vegetables Program in which most individual FDPIR programmes now participate⁽⁴⁷⁾. It will be important that these fresh fruit and vegetable offerings be kept fresh, or that canned or frozen produce is utilized, in order to retain maximum phytonutrients to benefit human health.

Given the variable HEI-2010 scores of different FDPIR food packages, directing food options to increase nutrient diversity would likely result in improved nutrition and health outcomes of participants. Healthy food choices may be encouraged through enhancing the sensory appeal of individual FDPIR offerings; for example, researchers should consider studying the consumer appeal components that FDPIR foods, packages and programme centres provide, as to the authors' knowledge no study has been conducted about the attractiveness of these variables to native populations. Additionally, increasing availability and diversity of culturally appropriate foods in specific food components that do not meet minimum recommendations would also assist in increasing the HEI-2010 score, specifically for Total Fruit, Total Vegetables, Greens and Beans, Dairy, Total Protein Foods, Refined Grains or Sodium. The addition of limes would add to overall



availability of Total Fruit; replacing refined grains with whole grains such as wild rice, barley, quinoa, blue cornmeal, sorghum and rye has the potential to improve the Refined Grains score; and adding bison to the offerings would improve access to Total Protein Foods. Recently, Congress directed that a portion of FDIPIR funding be used to purchase bison meat because of its low fat content and cultural value for American Indians, even if this is not tribally specific⁽⁴⁷⁾.

There is promising opportunity to implement nutrition education and cooking demonstrations on how to supplement FDIPIR offerings with culturally appropriate, accessible and healthy foods, especially since federal grant mechanisms exist to support nutrition education related to the FDIPIR through the USDA Food Distribution Program Nutrition Education (FDPNE)⁽⁴⁸⁾. Several successful initiatives have been launched to date that serve to enhance the food choices of FDIPIR participants in culturally appropriate ways, including cooking demonstrations, taste tests, cooking competitions, gardening demonstrations with traditional foods, health wellness programmes and special events such as health fairs⁽⁴⁷⁾.

The present study has several limitations that are important to address when interpreting findings and examining implications. As with many other studies that utilize the Health Eating Index to study nutritional adequacy in various settings (e.g. foods offered to children at child-care centres, foods offered to children through backpack programmes, the dollar menu displayed at a fast-food restaurant)^(43,44,49), it is important to note that this evaluation of FDIPIR involves analysis of food products and not actual consumer consumption. For example, the study assessed the quality of five randomly generated food packages of the FDIPIR rather than actual food package selections made by participants. In addition, the study does not take into consideration other foods with which participants may supplement their food assistance packages such as local wild and cultivated foods or purchased foods. Finally, the availability of individual products is subject to market conditions, ITO and state agency orders, and seasonal availability. The current study did not limit USDA foods or options according to these factors and no published list is available to reflect that information to the authors' knowledge. Despite these limitations, the present study contributes to the sparse published literature assessing nutritional quality of a national food commodity programme geared toward a specific racial demographic.

There is a need for future studies to establish the linkages between FDIPIR participation and long-term nutrition and health outcomes. Specifically, such future studies should examine the complex interplay between the FDIPIR and other aspects of the food environment and food access, along with consumer lifestyle behaviour and dietary choices, food quality, genetics, epigenetics and food sovereignty. Studies that examine the HEI-2010 on actual FDIPIR packages and diets of participants would

further enhance the understanding of the contribution of this federal assistance programme to nutrition and health outcomes. Research on the FDIPIR is particularly pressing because of the lack of available studies on the federal nutrition programme that serves an extremely vulnerable population in the USA that is at high risk of diet-related chronic disease⁽³¹⁾.

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This funding will help States meet the requirements of the law through grants to States and technical assistance. The grants will enable States with demonstrated need to purchase and implement required data collection and analysis software. The software will function in concert with existing State systems to help analyze data to improve E&T service delivery. Refer to Current Law Proposal Summary: Development of State SNAP Employment and Training (E&T) Program Data Collection and Reporting Systems. The requested increase also includes a pay cost increase of \$353,000 as well as estimated inflation (Federal costs).

- j. No change for the Financial Management Modernization Initiative (FMMI) (\$3,500,000 enacted in FY 2016).

Financial Management Modernization Initiative (FMMI) is an on-going project to enhance financial system transparency and reporting capabilities in advance of new OMB and Treasury initiatives to improve financial management and reporting government-wide. This transparency and advanced functionality will support ensuring integrity in SNAP.

- k. No change for IT Modernization and Support (\$2,000,000 enacted in FY 2016).

This line provides for the operations, maintenance, and enhancement costs associated with Federal systems and equipment.

- 7) An increase of \$6,279,000 for Nutrition Assistance Program for Puerto Rico (\$1,959,136,000 enacted in FY 2016).

Section 19(b) of the Food and Nutrition Act of 2008 (as amended by P.L. 110-246), provides for an inflationary adjustment for Nutrition Assistance for Puerto Rico based on estimated changes in the Thrifty Food Plan.

- 8) An increase of \$25,000 for American Samoa (\$7,868,000 enacted in FY 2016).

Section 19(c) of the Food and Nutrition Act of 2008 (as amended by P.L. 110-246), provides for an inflationary adjustment for Nutrition Assistance to American Samoa based on estimated changes in the Thrifty Food Plan.

- 9) An increase of \$5,809,000 for the Food Distribution Program on Indian Reservations (FDPIR) (\$145,191,000 enacted FY 2016).

The Food and Nutrition Act of 2008 provides for an alternative program to SNAP EBT for Indian Tribal Organizations (ITOs) that qualify. This line provides for the food costs and administration of this program. The program provides food packages to ITOs to improve nutrition and provide culturally appropriate sustenance. The requested level will support about 100,000 participants per month. Participation in FDPIR has been steadily increasing since the sunset of the additional Recovery Act SNAP benefit in October 2013. While the program has been serving more participants, administrative resources for the ITOs administering the program have remained flat. Additional resources of \$5,000,000 are requested for administrative funding beyond usual inflation due to the significant increase in participation. Refer to Current Law Proposal Summary: Increase FDPIR Administrative Funding Beyond the Inflationary Adjustment Due to Significantly Increased Participation. Details of the program trends in FDPIR can be found on the table below.

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FDPIR Performance Table

Program Performance Data	2014 Actual	2015 Actual	2016 Estimate	Inc. or Dec.	2017 Estimate
Resources: (\$000)					
Appropriation	\$119,500	\$145,191	\$145,191	\$5,809	\$151,000
Beginning Inventory (Federal and Local)	7,494	27,391	22,400	13,957	36,357
Total Resources	126,994	172,582	167,591	19,766	187,357
Program Demand:					
Average Monthly Participation	85,617	88,500	94,000	6,000	100,000
Average Monthly Food Packages:					
FNS Purchased	\$67.59	\$77.28	\$78.65	\$1.63	\$80.28
Total Monthly Food Package	67.59	77.28	78.65	1.63	80.28
Demand: (\$000)					
FDPIR USDA Food Costs	69,425	89,033	88,719	7,614	96,333
USDA Foods Purchases Admin.	689	802	988	18	1,006
Demand, USDA Foods	70,114	89,835	89,707	7,632	97,339
State Administration	40,189	40,792	41,527	6,163	47,690
Total Demand	110,303	130,627	131,234	13,795	145,029
Use of Resources:					
Program Demand	110,303	130,627	131,234	13,795	145,029
Inventory Change	8,724	-4,991	13,957	-7,986	5,971
Remaining Available for Upward Adjustments	473	0	0	0	0
Total Funds Available	119,500	125,636	145,191	5,809	151,000
Balance End of Year:					
Ending Inventory	16,218	22,400	36,357	5,971	42,328
Commodity Obligations	78,838	104,399	103,664	-354	103,310

- 10) A decrease of \$19,000,000 for The Emergency Food Assistance Program (TEFAP) (\$318,000,000 enacted in FY 2016).

Section 27(a) of the Food and Nutrition Act of 2008 requires the Secretary to purchase USDA Foods for distribution through The Emergency Food Assistance Program (TEFAP). The section establishes a baseline funding level and a formula for annual adjustments based on food price inflation. The 2014 Farm Bill update to Section 27 increased base funding for TEFAP Commodities for fiscal years 2015 through 2018. However, the additional increment provided through the Farm Bill declines – from an additional \$50 million in FY 2015 down to an additional \$15 million in FY 2018. The FY 2017 change in the request for TEFAP foods is due to this decline, which decreases funding from \$40,000,000 in FY 2016 to \$20,000,000 in FY 2017. In order to help mitigate declining resources for the purchase of TEFAP foods, the President’s Budget includes a legislative proposal to add an additional \$30 million for the purchase of TEFAP foods in FY 2017 and returns future funding to FY 2015 levels(see the legislative proposal entitled “Increase TEFAP Food Funding to Curtail the Continuing Reduction in Food Resources.”)

- 11) No change for the Commonwealth of the Northern Marianas Islands (CNMI) (\$12,148,000 enacted in FY 2016).

The CNMI nutrition program provides a diversity of activities that allow the residents of the islands access to nutritious food. There are no changes to the funding level of this line.

- 12) No change for the Community Food Project (\$9,000,000 enacted in FY 2016).

Section 26 of the Food and Nutrition Act of 2008 (as amended) provides \$9 million per year to meet the Hunger Free Communities goals as described in House Concurrent Resolution 302, 102nd Congress, agreed to October 5, 1992.

- 13) No change for Program Access (\$5,000,000 enacted in FY 2016).

Program Access Grants are authorized by Section 11(t) of the Food and Nutrition Act of 2008.

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14) An increase of \$2,000,000 Nutrition Education Centers of Excellence (\$0 enacted in FY 2016).

This line supports the SNAP Expanded Food and Nutrition Education Program Centers of Excellence. Refer to Current Law Proposal Summary: Supplemental Nutrition Assistance Program (SNAP) – Expanded Food and Nutrition Education Program (EFNEP)

Discretionary:

15) No change for FDPIR Nutrition Education (\$998,000 enacted in FY 2016).

This line allows for the continuation of FDPIR Nutrition Education discretionary grant activities.

16) An increase of \$5,000,000 National Health Nutrition Examination Survey (NHANES) (\$0 enacted in FY 2016).

Funding for national food consumption survey capacity, food composition data, and research base for Dietary Reference Intakes to provide the scientific evidence base for the USDA food assistance programs. Funding for the survey has not increased in over 20 years. With this funding, NHANES will gather additional data used to assess nutritional status and its association with health promotion and disease prevention. NHANES findings are also the basis for national standards for such measurements as height, weight, and blood pressure.

17) An increase of \$2,000,000 for FDPIR Traditional Foods Demonstration (\$0 enacted in FY 2016).

This line supports awarding noncompetitive grants to one or more FDPIR Indian Tribal Organizations (ITOs) for the purchase of nutritious and traditional foods, and, when practicable, foods produced locally by Indian producers, for distribution to FDPIR recipients. This demonstration differs from current efforts to procure traditional foods for FDPIR because the funds are provided directly to the administering ITOs in order for them to procure foods that are traditional or culturally relevant to their own ITO. Refer to Current Law Proposal Summary: Fully fund the 2014 Farm Bill FDPIR Traditional Foods Grant Program.

FY 2017 Current Law Proposals
(Dollars in thousands)

Project	President's Request
Mandatory Other Program Costs	
Payment Accuracy and Cooperative Services	
Improved SNAP Client Integrity Education	\$3,000
Nutrition Education and Program Information	
Employment and Training Technical Assistance	4,000
SNAP-Ed Technical Assistance	1,200
Dietary Guidelines Research Formative & Evaluation	1,500
Dietary Guidelines Interactive Tools	1,000
Grants to States for E&T Data Collection Systems	3,000
Total, Mandatory Other Program Costs	13,700
Discretionary Other Program Costs	
FDPIR Traditional Foods Demonstration - 2014 FB	2,000
Total, Discretionary Other Program Costs	2,000
Nutrition Education Center of Excellence	2,000
FDPIR	
Distributing Agencies Expenses and Nut. Ed.	5,000
Total, FDPIR	5,000
Total, Supplemental Nutrition Assistance Program	22,700

1/The Budget includes Child Support Enforcement proposals that increase collections and expand distribution, which in turn reduce low-income families reliance on SNAP and result in savings to the program. Outlays - \$13M in 2017

2/The Budget includes proposals to extend SSI eligibility for elderly and disabled refugees, asylees and other humanitarian immigrants, increasing their income and reducing their reliance on SNAP, resulting in savings to the program.

Outlays - \$8M in 2017

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enhance the quality and impact of E&T programs and services. For example, an analysis of outcome data may show that certain credentials or training investments leads to higher employment rates or higher job retention for SNAP recipients. As a result, these efforts will improve the Program's ability to help SNAP recipients obtain and retain good jobs.

This proposal will help States meet the requirements of the forthcoming regulation through discretionary grants that fund the purchase of software for States with demonstrated need, the adaptation of this software to function in concert with existing State systems, if possible, and technical assistance in analyzing data to improve E&T service delivery.

As a result of this investment, State agencies will receive necessary financial and technical support in meeting legislative and regulatory requirements as well as the ability to critically review and analyze program services and outcomes. Without this additional funding, State agencies may not have financial resources to develop outcome data collection and reporting systems and may rely on information reported by vendors without the ability to validate and analyze this data independently.

Funding will remain available until expended.

Budget Impact:
(\$ millions)

	FY17	FY18	FY19	FY20	FY21	Total
Budget Authority	\$3.0	\$3.0	\$3.0	\$3.0	\$3.0	\$15.0

FNCS PRESIDENT'S BUDGET FISCAL YEAR 2017 Current Law

Program(s): Food Distribution Program on Indian Reservations (FDPIR)

Proposal: Fully fund the 2014 Farm Bill FDPIR Traditional Foods Grant Program (Discretionary)

Rationale: The Agricultural Act of 2014 (P.L. 113-79, the 2014 Farm Bill) authorizes \$2,000,000 annually to support a demonstration project, subject to the availability of appropriations, for awarding grants to one or more FDPIR Indian Tribal Organizations (ITOs) for the purchase of nutritious and traditional foods, and, when practicable, foods produced locally by Indian producers, for distribution to FDPIR recipients. To date, no funding for the demonstration has been appropriated.

The Consolidated and Further Appropriations Act, 2015 (P.L. 113-235) provided \$5 million for USDA to use in purchasing traditional and locally-grown foods for FDPIR. USDA used this funding to purchase bison because it is, at this time, the only traditional food for which USDA can readily find vendors. Historically, it has been difficult to find vendors that can support a demand for large quantities of traditional foods and identify traditional foods which are acceptable to the program community nationally. Funding the 2014 Farm Bill-authorized traditional and local foods demonstration project would allow FNS to work with FDPIR program operators to explore another avenue to provide foods that meet the distinct needs of their local participants. Such foods may be more acceptable to FDPIR participants, as the procurement and provision of such foods under this provision may better accommodate localized traditional foods preferences.

In addition to providing additional healthy alternatives which make the food package more appealing to FDPIR participants, the increase in funding could stimulate Tribal economies through the purchase of traditional and locally-grown foods from vendors, some of which may be Native American farmers, ranchers, and producers. Funding FDPIR traditional and locally-grown food purchases would positively contribute to the jobs market in more rural areas and reservation lands.

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Budget Impact:
(\$ millions)

	FY17	FY18	FY19	FY20	FY21	Total
Budget Authority	\$2.0	\$2.0	\$2.0	\$2.0	\$2.0	\$10.0

FNCS PRESIDENT'S BUDGET FISCAL YEAR 2017 Current Law

Program(s): Supplemental Nutrition Assistance Program (SNAP) – Expanded Food and Nutrition Education Program (EFNEP)

Proposal: Strengthen the evidence base and promote innovation in education and obesity prevention through continuing the SNAP-EFNEP Nutrition Education/Obesity Prevention Centers of Excellence Increase FDPIR Administrative Funding Beyond the Inflationary Adjustment Due to Significantly Increased Participation

Rationale: Nutrition education and promotion programs for low-income and disadvantaged populations have been a USDA priority for nearly half century. Given the financial and organizational commitment to nutrition education and obesity prevention, National Institute of Food and Agriculture (NIFA) and FNS are committed to assuring that the EFNEP and SNAP-Ed programs are evidence-based, effective, actionable and cost efficient.

In 2014, NIFA and FNS jointly launched the SNAP-EFNEP Centers of Excellence to build the evidence-base for nutrition education and obesity prevention strategies and interventions that produce measurable changes in key health, obesity, nutrition, and physical activity-related outcomes. The Centers work closely with the two agencies and their State and community partners to develop effective policy, systems, environmental, and education/extension activities that promote health and prevent/reduce obesity among children and low-income people. The Centers work includes:

- Identifying and dissemination evidence-based practices;
- Developing new interventions to meet the needs of SNAP-Ed/EFNEP target subpopulations;
- Demonstrating SNAP-Ed/EFNEP effectiveness and identify changes that are needed to improve both programs to better serve their low-income clients.

The request will support the Centers to continue development and dissemination of evidence-based strategies for these two major nutrition education and public health programs.

Budget Impact:
(\$ millions)

	FY17	FY18	FY19	FY20	FY21	Total
Budget Authority	\$2.0	\$2.0	\$2.0	\$2.0	\$2.0	\$10.0

FNCS PRESIDENT'S BUDGET FISCAL YEAR 2017 Current Law

Program(s): Food Distribution Program on Indian Reservations (FDPIR)

Proposal: Increase FDPIR Administrative Funding Beyond the Inflationary Adjustment Due to Significantly Increased Participation

Rationale: FDPIR is a food package program that serves as an alternative to SNAP for low-income households living on participating Indian reservations and for American Indian households residing in approved areas near reservations or in Oklahoma. Many of these households do not have easy access to SNAP offices or authorized stores.

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FDPIR administering agencies, which include over 100 Indian Tribal Organizations (ITOs) and five State agencies (SA), receive administrative funds to operate a food distribution site that includes one or more warehouses, certification stations, counseling sessions for nutrition education, and out-bound food delivery to remote sites and home-bound clients. A significant portion of administrative funding is used by program operators to support infrastructure and equipment needs, such as forklifts, freezers and coolers, pallet jacks, and warehouse building maintenance for flooring and roofing. In addition, given the geographic size of many reservations, refrigerated trucks are often procured for delivery to remote locations.

In recent years, national FDPIR participation has increased substantially, from about 75,500 participants on an average monthly basis in FY 2013 to over 87,000 participants in FY 2015. This represents an increase of about 15 percent in individuals served each month. USDA food volume entering ITOs/SA warehouses has proportionately and significantly increased as well. Meanwhile, administrative funding available nationally has not kept pace over the same timeframe, increasing only five percent, from \$38.829 million in FY 2013 to \$40.792 million in FY 2015, due to inflation. The modest inflationary adjustment continues in FY 2016, while participation is expected to remain at higher levels.

Infrastructure improvement and equipment needs have gone unmet at many FDPIR program sites, hampering the ability of ITOs and SA to effectively administer the program. Additional funding is crucial to permit ITOs and SA to serve the higher volume of clients effectively and efficiently and to store the higher volume of food entering tribal warehouses safely and securely. FDPIR ITOs/SA have proven ability to expend such resources for necessary and reasonable expenses, having fully expended \$5 million in American Recovery and Reinvestment Act funds for equipment needs and facility improvements which expired in 2010.

Budget Impact:
(\$ millions)

	FY17	FY18	FY19	FY20	FY21	Total
Budget Authority	\$5.0	\$5.0	\$5.0	\$5.0	\$5.0	\$25.0

FY 2017 Proposed Legislation
(Dollars in thousands)

Item of Change	2017 Current Law	Change	President's Request
Benefits:			
SNAP Benefits	\$68,801,122	\$9,995	\$68,811,117
Contingency Reserve	5,000,000	0	5,000,000
Administrative Costs:			
State Administrative Costs	4,348,604	0	4,348,604
Nutrition Ed. & Obesity Prevention Grant Prog.	414,000	0	414,000
Employment and Training	465,680	0	465,680
Mandatory Other Program Costs	200,308	0	200,308
Discretionary Other Program Costs	7,998	0	7,998
Total Administrative Costs	5,436,590	0	5,436,590
Nutrition Assistance for Puerto Rico	1,965,415	0	1,965,415
American Samoa	7,893	0	7,893
Food Distribution Program on Indian Reservations	151,000	0	151,000
TEFAP Commodities	299,000	30,000	329,000
Commonwealth of the Northern Mariana Islands	12,148	0	12,148
Community Food Project	9,000	0	9,000
Program Access	5,000	0	5,000
Nut. Ed. Center of Excellence	2,000	0	2,000
Total Adjusted Appropriation	81,689,168	39,995	81,729,163

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Federal Responsibilities of the Block Grant

American Samoa submits a memorandum of understanding each fiscal year specifying how the program will be operated, including eligibility requirements to stay within the capped block grant amount. FNS must review and approve the annual memorandum of understanding and monitor program operations to ensure program integrity. These monitoring activities include reviewing financial reports of obligations and expenditures and on-site management reviews of selected program operations.

NUTRITION ASSISTANCE FOR THE COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS

Program Mission

The Commonwealth of the Northern Mariana Islands' (CNMI) nutrition assistance program began on July 2, 1982. The program was authorized by Public Law 96-597 (December 24, 1980), which allowed USDA to extend programs administered by the Department to CNMI and other territories. In FY 2015, \$12,648,000 in grant funds were provided to CNMI. This amount included a reprogramming of \$500,000 from SNAP benefits to CNMI to address unanticipated costs as a result of Typhoon Soudelor.

Section 4031 of the Agricultural Act of 2014 authorizes a feasibility study on implementing SNAP (in a manner similar to SNAP in the States) or an appropriate alternative in CNMI. If as a result of this study, the Secretary deems that a pilot project to implement SNAP is feasible, a pilot project will be conducted with funding limited to \$13.5 million (FY 2016) and \$8.5 million (for each of FYs 2017 and FY 2018). A report to Congress on the pilot project is due by June 30, 2019. The provision permits CNMI to keep any unspent pilot funds as part of their block grant, if the pilot is deemed not feasible.

Facts in Brief

- On average each month 8,077 people or 15.7 percent of CNMI's total estimated population of 51,483 were served during FY 2015.
- In FY 2015, average benefit costs were \$286 per household per month.
- CNMI NAP has elected to increase the Saipan allotment by 16 percent starting in January 2015.
- The CNMI spent an estimated \$1.342 million on administrative activities for FY 2015. This includes \$153,817 in Disaster Related expenditures due to Typhoon Soudelor. Block grant funding provides 100 percent of administrative and benefits costs.
- CNMI is allowed to set its eligibility standards within the capped block grant.
- CNMI prints its own food coupons.
- CNMI was hit with Typhoon Souledor in August and \$3,387,942 was spent in Disaster Supplemental Nutrition Assistance Benefits to aid 9,194 households.

Federal Responsibilities of the Block Grant

The CNMI submits a memorandum of understanding each fiscal year, specifying how the program will be operated, including eligibility requirements to stay within the capped block grant amount. FNS must review and approve the annual memorandum of understanding and monitor program operations to ensure program integrity. These monitoring activities include reviewing financial reports of obligations and expenditures and on-site management reviews of selected program operations.

As noted above, the Agricultural Act of 2014 authorized and funded a study to assess the capabilities of CNMI to operate SNAP in a similar manner to State agencies.

FOOD DISTRIBUTION PROGRAM ON INDIAN RESERVATIONS (FDPIR)

Program Mission

FDPIR is an alternative to SNAP for income-eligible households residing on Indian reservations and income-eligible Indian households in designated service areas near reservations or in Oklahoma. FDPIR is authorized by Section 4(b) of the Food and Nutrition Act of 2008, as amended, to allow Indian Tribal Organizations (ITOs) or an agency of the State government to operate a food distribution program for households who prefer USDA Foods to

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SNAP benefits. Each month, participating households receive a food package to help them maintain a nutritionally balanced diet. Participants may select from over 100 products including:

- Frozen ground beef, beef roast, and chicken
- Fresh and canned fruits and vegetables; pastas, cereals, rice, and other grains
- Canned soups
- Cheese, low-fat ultra high temperature milk, nonfat dry milk, and evaporated milk
- Flour and bakery mix
- Dried beans and dehydrated potatoes
- Bottled juices and dried fruit
- Peanut butter
- Vegetable oil.

Federal administrative funding is also available for nutrition education related activities, which can include individual nutrition counseling, group cooking demonstrations, nutrition classes, and the dissemination of resources, including recipes, related to USDA Foods. Households may not participate in FDPIR and SNAP in the same month.

Facts in Brief

- In FY 2015, five States and 100 ITOs administered programs on 276 Indian reservations, pueblos, rancherias, and Alaska Native Villages. Nutrition assistance was provided to an average of 88.6 thousand persons per month at a cost to FNS of \$65.22 per food package in FY 2015, with an average monthly per person administrative cost of \$39.77.

FDPIR PARTICIPATION AND COST

	2008	2009	2010	2011	2012	2013	2014	2015
Average Participation (in Thousands)	90.1	95.4	84.6	77.8	76.5	75.6	85.4	88.6
Per Person Per Month Food Cost (Entitlement)	\$54.42	\$54.65	\$47.45	\$50.71	\$57.04	\$59.31	\$60.92	\$65.22
Total FNS Food Cost (\$ in Millions)	\$53.41	\$55.02	\$48.17	\$47.37	\$52.38	\$53.94	\$62.51	\$69.34

Note: Total Per Person Food Costs differ from commodity procurement obligations due to inventory level changes.

Increased Food Funds for FDPIR: In FY 2014, FNS reprogrammed \$15.5 million from the SNAP account to FDPIR to support the unforeseen rise in food costs and program participation during the Fiscal Year. The additional funds allowed FNS to maintain sufficient inventories and ensured program participants received full food packages despite the rise in food costs and participation. FY 2015 continued to support higher participation levels and rises in food costs with a full year appropriations amount of almost \$104.4 million in food funding. The FY 2015 food allocation included \$5 million to procure traditional and locally-grown foods for the program.

Food Package: FNS continues its commitment to improve the food package offered under FDPIR through the FDPIR Food Package Review Work Group. The work group, consisting of National Association of Food Distribution Programs on Indian Reservations (NAFDPIR)-appointed representatives and FNS staff, is focusing on ways to better meet the nutritional needs and food preferences of program participants. The panel seeks to reduce saturated fat, sugar, and sodium in the food package and explore ways to increase the convenience and acceptability of products offered. In FY 2015, the work group assisted with piloting fresh shell eggs, the selection of bison and blue cornmeal as traditional food items, and the addition of pork chops to the FDPIR food package. In addition, the fresh lemons, cranberries and clementines were added through FNS' partnership with the Department of Defense (DoD) Fresh Program.

Traditional and Locally-Grown Food Fund: The 2014 Farm Bill reauthorized the 2008 Farm Bill provision which provided for the establishment of a fund, subject to the availability of appropriations, for use in purchasing

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traditional and locally-grown foods for FDPIR. In the FY 2015 full-year appropriated budget, FDPIR was allocated, for the first time, \$5 million to meet this provision. During the fiscal year, FNS worked the FDPIR Food Package Review Work Group members, to prioritize traditional food items for purchase based on participant preferences. As a result, FNS worked with AMS to purchase bison and blue cornmeal in FY 2015 to expend the \$5 million. These foods are expected to be delivered in FY 2016 to FDPIR participants. The selection of bison and blue cornmeal by the work group members was procured in FY 2015 to meet the provision.

Studies and Evaluations: FNS is working on a national study of FDPIR and its participants. The objectives include: updating the demographic profile of participants; exploring reasons for changes in FDPIR participation; examining food package distribution approaches and other key aspects of FDPIR operations; learning about FDPIR's contribution to participants' food supply; and learning about participant satisfaction with the program. A final report is due in 2016.

Nutrition Education Activities: In FY 2015, FNS awarded nearly \$1 million in Food Distribution Program on Indian Reservations Nutrition Education Grants to 15 grantees. The grants promote the healthy foods offered in FDPIR and follow the most recent edition of the *Dietary Guidelines for Americans*. Among the recipients, six awardees are located in areas designated to participate in the Secretary of Agriculture's *StrikeForce for Rural Growth and Opportunity Initiative*, and one awardee is located in a community to benefit from President Obama's *Promise Zones Initiative*. In addition, USDA FNS staff worked with the FDPIR Program Directors to create double-sided banners highlighting the FDPIR Food Package and nutrition education. The double-sided banner highlights the program under the tagline, *Healthy Choices, 100% American Grown*, and features information on nutrition education and the FDPIR food package. Tribal Organizations operating FDPIR may use the banner at health fairs, with partner organizations, and during FDPIR nutrition education events. In addition, at the end of FY 2015, FNS awarded a contract to evaluate incorporating a nutrition paraprofessional component to the FDPIR nutrition education portfolio. Final results are expected in FY 2017.

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FOOD DISTRIBUTION PROGRAM ON INDIAN RESERVATIONS PARTICIPATION AND FUNDING FISCAL YEAR 2015

STATE OR TERRITORY	AVERAGE MONTHLY PARTICIPATION	FOOD COSTS <u>1/</u>	ADMINISTRATIVE FUNDING <u>2/</u>	TOTAL FOOD AND ADMIN.
Alaska-----	479	\$327,587	697,973	\$1,025,560
Arizona-----	11,880	9,623,243	4,565,882	14,189,125
California-----	5,159	3,629,465	2,711,221	6,340,686
Colorado-----	402	302,388	272,505	574,893
Idaho-----	1,688	1,168,757	729,514	1,898,271
Kansas-----	569	431,466	258,688	690,154
Michigan-----	1,971	1,596,726	1,216,091	2,812,817
Minnesota-----	2,645	2,098,052	1,593,067	3,691,119
Mississippi-----	958	666,056	260,424	926,480
Montana-----	3,149	2,532,773	2,488,916	5,021,689
Nebraska-----	1,339	969,725	399,290	1,369,015
Nevada-----	1,508	957,133	710,814	1,667,947
New Mexico-----	2,966	2,199,657	1,617,002	3,816,659
New York-----	369	379,566	379,109	758,675
North Carolina-----	743	554,334	166,419	720,753
North Dakota-----	4,976	3,963,907	2,066,235	6,030,142
Oklahoma-----	31,042	24,935,465	10,188,367	35,123,832
Oregon-----	800	576,716	696,330	1,273,046
South Dakota-----	8,208	6,583,634	3,332,762	9,916,396
Texas-----	142	87,861	145,834	233,695
Utah-----	217	151,091	95,571	246,662
Washington-----	3,284	2,505,025	2,381,611	4,886,636
Wisconsin-----	3,240	2,414,412	1,837,047	4,251,459
Wyoming-----	881	695,868	227,766	923,634
AMS / FSA / PCIMS / Computer Support----	0	836,044	0	836,044
Undistributed-----	0	32,016,508	1,679,096	33,695,604
TOTAL-----	88,615	\$102,203,458	\$40,717,534	\$142,920,992

SOURCE: FPRS FNS-152 data - Food distributed to participants in fiscal year 2015.

1/ Total value of entitlement foods. Costs do not include bonus commodities, food losses, storage and transportation for certain items (Group A fruits and vegetables, all Group B commodities), the value of food used for nutrition education, or the Department of Defense Regional Pilot.

2/ Administrative funding represents the total of Federal outlays and unliquidated obligations.

NOTE: These data are based in part on preliminary reports submitted by State and local agencies and are subject to change as revisions are received. Totals reflect Federal obligations and differ from State reported data.

FOOD AND NUTRITION SERVICE

FOOD DISTRIBUTION PROGRAM ON INDIAN RESERVATIONS

Quantity and Value of Commodities
Fiscal Year 2015

ENTITLEMENT COMMODITIES	Pounds	Dollars
APPLESAUCE, CANNED, W/O SALT, UNSWEETENED	490,050	\$291,893
APRICOTS, CANNED, HALVES, LT SYRUP	393,975	448,122
BEANS, CANNED, BLACK	142,290	62,409
BEANS, CANNED, GREEN, LOW-SODIUM	977,228	382,097
BEANS, CANNED, LIGHT RED KIDNEY, LOW-SODIUM	462,443	215,745
BEANS, CANNED, PINTO, LOW-SODIUM	462,443	190,837
BEANS, CANNED, REFRIED, LOW-SODIUM	550,800	250,400
BEANS, CANNED, VEGETARIAN, LOW-SODIUM	403,920	171,743
BEANS, DRY, GREAT NORTHERN, W/O SALT	483,840	234,736
BEANS, DRY, PINTO, W/O SALT	1,310,640	524,372
BEEF, CANNED	648,000	2,314,105
BEEF, FINE GROUND, FROZEN	3,288,000	11,139,822
BEEF, ROUND ROAST, FROZEN	1,680,000	7,388,468
BEEF STEW, CANNED	2,557,800	2,688,921
BISON, GROUND, FROZEN	640,000	5,334,000
CARROTS, CANNED, LOW-SODIUM	307,350	143,430
CHICKEN, CONSUMER SPLIT BRST PKG	1,716,000	2,871,426
CHICKEN, WHOLE, BAGGED	1,084,800	1,183,589
CHICKEN, CANNED	455,625	863,901
CORN, CANNED, CREAM STYLE	364,500	181,926
CORN, CANNED, WHOLE KERNEL, NO SALT ADDED	1,366,443	548,015
CRANBERRY SAUCE, CANNED	220,320	123,471
*DoD FRESH PRODUCE		8,016,641
EGG MIX, DRIED	648,000	3,950,348
FRUIT-NUT MIX, DRY	209,664	665,363
HAM, WATER ADDED, FROZEN	727,200	1,100,808
PORK CHOPS, FROZEN	950,000	3,376,300
HOMINY, CANNED	143,820	69,554
JUICE, BOTTLED, APPLE, UNSWEETENED	3,406,572	1,249,506
JUICE, BOTTLED, CRANBERRY APPLE, UNSWEETENED	1,783,500	714,558
JUICE, BOTTLED, GRAPE, UNSWEETENED	1,630,380	691,650
JUICE, BOTTLED, GRAPEFRUIT, UNSWEETENED	356,700	126,957
JUICE, BOTTLED, ORANGE, UNSWEETENED	3,014,550	1,479,718
JUICE, BOTTLED, TOMATO, UNSWEETENED	763,860	228,315
MIXED FRUIT, CANNED, LT SYRUP	1,136,025	1,203,387
MIXED VEGETABLES, CANNED, LOW-SODIUM	583,200	321,262
PEACHES, CANNED, CLING, LT SYRUP	1,714,950	1,753,584
PEARS, CANNED, LT SYRUP	546,750	491,540
PEAS, CANNED, LOW-SODIUM	635,850	340,393
PLUMS, DRIED	216,000	551,985
POTATOES, DEHYDRATED	300,000	290,325
POTATOES, CANNED, SLICED	330,480	140,928
PUMPKIN, CANNED	145,800	112,946
RAISINS	272,160	345,220
SOUP, CANNED, TOMATO, CONDENSED, LOW-SODIUM	283,800	182,512
SOUP, CANNED, VEGETABLE, LOW-SODIUM	248,325	198,792
SOUP, CREAM OF CHICKEN, REDUCED SODIUM	693,000	687,288
SOUP, CREAM OF MUSHROOM, REDUCED SODIUM	554,400	527,352
SPAGHETTI SAUCE, CANNED, MEATLESS, LOW-SODIUM	826,875	332,050
SPINACH, CANNED, LOW-SODIUM	203,490	111,193
TOMATO SAUCE, CANNED, NO SALT ADDED	722,925	283,004
TOMATOES, CANNED, DICED, NO SALT ADDED	845,640	353,662
SALMON, CANNED	106,200	212,160
TURKEY BREAST, COOKED	360,126	1,652,514
SUBTOTAL	44,366,708	\$69,315,244

FOOD AND NUTRITION SERVICE

FOOD DISTRIBUTION PROGRAM ON INDIAN RESERVATIONS (Cont.)

Quantity and Value of Commodities

Fiscal Year 2015

ENTITLEMENT COMMODITIES	Pounds	Dollars
BUTTER, SALTED	235,440	\$535,203
BUTTERY SPREAD, LIGHT, ZERO TRANS FAT	372,623	372,250
CEREAL, CORN AND RICE, READY-TO-EAT	102,060	151,631
CEREAL, CORN FLAKES, READY-TO-EAT	240,570	209,539
CEREAL, CORN SQUARES, READY-TO-EAT	148,176	240,223
CEREAL, OAT CIRCLES, READY-TO-EAT	144,732	151,886
CEREAL, RICE CRISPS, READY-TO-EAT	288,000	329,978
CEREAL, WT BRAN FLAKES, READY-TO-EAT	127,272	109,524
CHEESE, BLEND, AMER/SKIM MILK, SLICED	752,400	1,229,275
CHEESE, PROCESSED, LOAVES	2,574,000	4,760,506
CORNMEAL, BLUE	76,032	69,569
CORNMEAL, YELLOW	1,328,040	298,968
CRACKERS, UNSALTED	993,600	1,344,859
EGG NOODLES	718,800	607,023
FARINA, QUICK COOKING	426,888	256,016
FLOUR MIX, LOWFAT	1,671,840	1,494,847
FLOUR, ALL PURPOSE, ENRICHED	6,897,240	1,540,672
FLOUR, WHOLE WHEAT	471,240	106,183
MAC N CHEESE MIX, DRY	793,962	568,126
MACARONI	1,419,600	655,468
MILK, EVAPORATED, CANNED, SKIM	2,416,635	1,500,775
MILK, INSTANT NDM	172,800	311,618
MILK, UHT, 1% LOW-FAT	6,869,250	2,405,012
OATS, WHOLE GRAIN, NO ADDED SALT	1,575,000	752,372
OIL, VEGETABLE	1,234,926	668,316
PEANUT BUTTER, SMOOTH	804,330	850,671
PEANUTS, ROASTED	285,120	537,449
RICE, WHITE	1,311,000	441,047
ROTINI, WHOLE GRAIN	102,000	46,077
SPAGHETTI	1,042,400	459,423
SUBTOTAL	35,595,975	\$23,004,506
AMS / FSA / WBSCM / Computer Support	0	836,044
Anticipated Adjustment	0	9,047,664
TOTAL COMMODITY ENTITLEMENT	79,962,683	\$102,203,458
BONUS COMMODITIES	Pounds	Dollars
NONE	0	\$0
TOTAL BONUS COMMODITIES	0	0
TOTAL -- ALL COMMODITIES	79,962,683	\$102,203,458
Anticipated Adjustment	0	0
GRAND TOTAL	79,962,683	\$102,203,458

Source: WBSCM -- Sales Order and contract information.

* DoD Fresh Includes Top Five (5) Foods: Apples, Oranges, Carrots, Lettuce, Tomatoes

Trust Funds

FOREIGN SERVICE NATIONAL SEPARATION LIABILITY TRUST FUND

Program and Financing (in millions of dollars)

Identification code 012-8505-0-7-602	2015 actual	2016 est.	2017 est.
Budgetary resources:			
Unobligated balance:			
1000 Unobligated balance brought forward, Oct 1	13	13	13
1930 Total budgetary resources available	13	13	13
Memorandum (non-add) entries:			
1941 Unexpired unobligated balance, end of year	13	13	13
4180 Budget authority, net (total)			
4190 Outlays, net (total)			

This fund is maintained to pay separation costs for locally-employed staff in those countries in which such pay is legally authorized. The fund will be maintained by annual government contributions which are appropriated to the Foreign Agricultural Service Salaries and Expenses account.

FOOD AND NUTRITION SERVICE**Federal Funds**

NUTRITION PROGRAMS ADMINISTRATION

For necessary administrative expenses of the Food and Nutrition Service for carrying out any domestic nutrition assistance program, **[\$150,824,000] \$179,447,000: Provided**, That of the funds provided herein, \$2,000,000 shall be used for the purposes of section 4404 of Public Law 107-171, as amended by section 4401 of Public Law 110-246. (*Agriculture, Rural Development, Food and Drug Administration, and Related Agencies Appropriations Act, 2016.*)

Program and Financing (in millions of dollars)

Identification code 012-3508-0-1-605	2015 actual	2016 est.	2017 est.
Obligations by program activity:			
0001 Nutrition programs administration	147	149	177
0003 Congressional hunger center fellowship	2	2	2
0005 Dietary Guidelines Study		1	
0900 Total new obligations	149	152	179
Budgetary resources:			
Budget authority:			
Appropriations, discretionary:			
1100 Appropriation	151	152	179
1900 Budget authority (total)	151	152	179
1930 Total budgetary resources available	151	152	179
Memorandum (non-add) entries:			
1940 Unobligated balance expiring	-2		
Change in obligated balance:			
Unpaid obligations:			
3000 Unpaid obligations, brought forward, Oct 1	41	32	24
3010 Obligations incurred, unexpired accounts	149	152	179
3011 Obligations incurred, expired accounts	5		
3020 Outlays (gross)	-158	-160	-175
3041 Recoveries of prior year unpaid obligations, expired	-5		
3050 Unpaid obligations, end of year	32	24	28
Memorandum (non-add) entries:			
3100 Obligated balance, start of year	41	32	24
3200 Obligated balance, end of year	32	24	28
Budget authority and outlays, net:			
Discretionary:			
4000 Budget authority, gross	151	152	179
Outlays, gross:			
4010 Outlays from new discretionary authority	126	128	151
4011 Outlays from discretionary balances	32	32	24
4020 Outlays, gross (total)	158	160	175
4180 Budget authority, net (total)	151	152	179
4190 Outlays, net (total)	158	160	175

This account funds the majority of the Federal operating expenses of the Food and Nutrition Service and the Center for Nutrition Policy and Promo-

tion (CNPP). Funding is also provided for the Congressional Hunger Fel-lows Program.

Object Classification (in millions of dollars)

Identification code 012-3508-0-1-605	2015 actual	2016 est.	2017 est.
Direct obligations:			
Personnel compensation:			
11.1 Full-time permanent	75	94	96
11.3 Other than full-time permanent	1	1	1
11.5 Other personnel compensation	5	1	1
11.9 Total personnel compensation	81	96	98
12.1 Civilian personnel benefits	26	30	31
21.0 Travel and transportation of persons	2	2	2
23.1 Rental payments to GSA	8	13	31
23.3 Communications, utilities, and miscellaneous charges	1		
25.2 Other services from non-Federal sources	23	4	10
25.3 Other goods and services from Federal sources	5	3	3
26.0 Supplies and materials	1	1	1
31.0 Equipment		1	1
41.0 Grants, subsidies, and contributions	2	2	2
99.9 Total new obligations	149	152	179

Employment Summary

Identification code 012-3508-0-1-605	2015 actual	2016 est.	2017 est.
1001 Direct civilian full-time equivalent employment	861	1,000	1,000

SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM

For necessary expenses to carry out the Food and Nutrition Act of 2008 (7 U.S.C. 2011 et seq.), **[\$80,849,383,000] \$81,689,168,000**, of which **[\$3,000,000,000] \$5,000,000,000**, to remain available through **[December 31, 2017] September 30, 2018**, shall be placed in reserve for use only in such amounts and at such times as may become necessary to carry out program operations: *Provided*, That funds **[available for the contingency reserve under the heading "Supplemental Nutrition Assistance Program" of division A of Public Law 113-235 shall be available until December 31, 2016: *Provided further*, That funds] provided herein shall be expended in accordance with section 16 of the Food and Nutrition Act of 2008: *Provided further*, That of the funds made available under this heading, \$998,000 may be used to provide nutrition education services to State agencies and Federally Recognized Tribes participating in the Food Distribution Program on Indian Reservations: *Provided further*, That, of the funds made available under this heading, \$5,000,000 may be used to fund a national food consumption survey: *Provided further*, That, of the funds made available under this heading, \$2,000,000 shall be used for a traditional and local foods demonstration project as provided in section 4004(b)(6) of the Agricultural Act of 2014 (Public Law 113-79): *Provided further*, That this appropriation shall be subject to any work registration or workfare requirements as may be required by law: *Provided further*, That funds made available for Employment and Training under this heading shall remain available through September 30, **[2017] 2018: *Provided further***, That funds made available under this heading for section 28(d)(1) and section 27(a) of the Food and Nutrition Act of 2008 shall remain available through September 30, **[2017] 2018: *Provided further***, That funds made available under this heading may be used to enter into contracts and employ staff to conduct studies, evaluations, or to conduct activities related to program integrity provided that such activities are authorized by the Food and Nutrition Act of 2008.**

For necessary expenses to carry out the Food and Nutrition Act of 2008 (7 U.S.C. 2011 et seq.) for the first quarter of fiscal year 2018, \$19,647,500,000, to remain available through September 30, 2018.

For making, after June 30 of the current fiscal year, benefit payments to individuals, and payments to states or other non-Federal entities, pursuant to the Food and Nutrition Act of 2008 (7 U.S.C. 2011 et seq.), for unanticipated costs incurred for the last three months of the current fiscal year, such sums as may be necessary. (Agriculture, Rural Development, Food and Drug Administration, and Related Agencies Appropriations Act, 2016.)

Program and Financing (in millions of dollars)

Identification code 012-3505-0-1-605	2015 actual	2016 est.	2017 est.
Obligations by program activity:			
0001 Benefits issued	69,524	70,124	68,796
0002 State administration	3,929	4,222	4,349

SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM—Continued
Program and Financing—Continued

Identification code 012–3505–0–1–605	2015 actual	2016 est.	2017 est.
0003 Employment and training program	430	455	466
0004 Other program costs	162	172	200
0005 Nutrition Assistance for Puerto Rico	1,951	1,959	1,965
0006 Food Distribution Program on Indian Reservations (Commodities in lieu of food stamps)	102	103	103
0007 Food Distribution Program on Indian Reservations (Cooperator administrative expense)	41	41	48
0008 The Emergency Food Assistance Program (commodities)	321	318	299
0009 American Samoa	8	8	8
0010 Community Food Projects	9	9	9
0011 Commonwealth of the Northern Mariana Islands	13	12	12
0012 Nutrition Education Grant Program	394	408	414
0013 Program access	5	5	5
0016 Other Pilots and Demonstrations	1		
0021 Employment and Training Work Pilots	200		
0091 Direct program activities, subtotal	77,090	77,836	76,674
0501 Direct Funds for Program Integrity		4	9
0799 Total direct obligations	77,090	77,840	76,683
0801 Supplemental Nutrition Assistance Program (Reimbursable)	73	80	80
0900 Total new obligations	77,163	77,920	76,763
Budgetary resources:			
Unobligated balance:			
1000 Unobligated balance brought forward, Oct 1	3,060	3,058	3,057
1021 Recoveries of prior year unpaid obligations	18		
1050 Unobligated balance (total)	3,078	3,058	3,057
Budget authority:			
Appropriations, discretionary:			
1100 Appropriation	1	1	14
Appropriations, mandatory:			
1200 Appropriation	81,837	80,847	81,676
1230 Appropriations and/or unobligated balance of appropriations permanently reduced	–8	–9	
1260 Appropriations, mandatory (total)	81,829	80,838	81,676
Spending authority from offsetting collections, mandatory:			
1800 Collected	73	80	80
1900 Budget authority (total)	81,903	80,919	81,770
1930 Total budgetary resources available	84,981	83,977	84,827
Memorandum (non-add) entries:			
1940 Unobligated balance expiring	–4,760	–3,000	–5,000
1941 Unexpired unobligated balance, end of year	3,058	3,057	3,064
Change in obligated balance:			
Unpaid obligations:			
3000 Unpaid obligations, brought forward, Oct 1	3,284	3,704	3,219
3010 Obligations incurred, unexpired accounts	77,163	77,920	76,763
3011 Obligations incurred, expired accounts	18		
3020 Outlays (gross)	–76,217	–77,963	–76,788
3040 Recoveries of prior year unpaid obligations, unexpired	–18		
3041 Recoveries of prior year unpaid obligations, expired	–526	–442	
3050 Unpaid obligations, end of year	3,704	3,219	3,194
Memorandum (non-add) entries:			
3100 Obligated balance, start of year	3,284	3,704	3,219
3200 Obligated balance, end of year	3,704	3,219	3,194

Budget authority and outlays, net:			
Discretionary:			
4000 Budget authority, gross	1	1	14
Outlays, gross:			
4010 Outlays from new discretionary authority			9
4011 Outlays from discretionary balances	71	1	1
4020 Outlays, gross (total)	71	1	10
Mandatory:			
4090 Budget authority, gross	81,902	80,918	81,756
Outlays, gross:			
4100 Outlays from new mandatory authority	73,852	74,866	73,669
4101 Outlays from mandatory balances	2,294	3,096	3,109
4110 Outlays, gross (total)	76,146	77,962	76,778
Offsets against gross budget authority and outlays:			
Offsetting collections (collected) from:			
4123 State Option Plans	–76	–80	–80
Additional offsets against gross budget authority only:			
4142 Offsetting collections credited to expired accounts	3		
4160 Budget authority, net (mandatory)	81,829	80,838	81,676
4170 Outlays, net (mandatory)	76,070	77,882	76,698

4180 Budget authority, net (total)	81,830	80,839	81,690
4190 Outlays, net (total)	76,141	77,883	76,708

Summary of Budget Authority and Outlays (in millions of dollars)

	2015 actual	2016 est.	2017 est.
Enacted/requested:			
Budget Authority	81,830	80,839	81,690
Outlays	76,141	77,883	76,708
Legislative proposal, subject to PAYGO:			
Budget Authority			19
Outlays			19
Total:			
Budget Authority	81,830	80,839	81,709
Outlays	76,141	77,883	76,727

The Supplemental Nutrition Assistance Program (SNAP) is the primary source of nutrition assistance for low-income Americans. This account also includes funds for a grant to Puerto Rico to administer a low-income nutrition assistance program, in lieu of SNAP; funds to carry out the Emergency Food Assistance Act of 1983; and funds for food distribution and administrative expenses for Native Americans under section 4(b) of the Food and Nutrition Act.

The SNAP contingency fund holds benefits in reserve to cover unforeseen events, such as natural disasters and fluctuations in food prices.

In addition, the Budget proposes an advance appropriation and enhanced flexibility in the fourth quarter to conform the treatment of SNAP with other direct spending programs subject to appropriations that serve low-income individuals, such as Medicaid, SSI, Child Support, and Foster Care.

Object Classification (in millions of dollars)

Identification code 012–3505–0–1–605	2015 actual	2016 est.	2017 est.
Direct obligations:			
11.1 Personnel compensation: Full-time permanent	28	35	36
12.1 Civilian personnel benefits	7	11	11
21.0 Travel and transportation of persons	2	2	2
24.0 Printing and reproduction	1	1	1
25.2 Other services from non-Federal sources	82	82	82
26.0 Supplies and materials	423	422	402
31.0 Equipment	1	1	1
41.0 Grants, subsidies, and contributions	76,546	77,286	76,148
99.0 Direct obligations	77,090	77,840	76,683
99.0 Reimbursable obligations	73	80	80
99.9 Total new obligations	77,163	77,920	76,763

Employment Summary

Identification code 012–3505–0–1–605	2015 actual	2016 est.	2017 est.
1001 Direct civilian full-time equivalent employment	285	373	373

SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM

(Legislative proposal, subject to PAYGO)

Program and Financing (in millions of dollars)

Identification code 012–3505–4–1–605	2015 actual	2016 est.	2017 est.
Obligations by program activity:			
0008 The Emergency Food Assistance Program (commodities)			30
0023 Improve Access to SNAP for Low Income Elderly			10
0091 Direct program activities, subtotal			40
0799 Total direct obligations			40
0900 Total new obligations (object class 41.0)			40
Budgetary resources:			
Budget authority:			
Appropriations, mandatory:			
1200 Appropriation			19
1900 Budget authority (total)			19
1930 Total budgetary resources available			19

SEC. 4004. FOOD DISTRIBUTION PROGRAM ON INDIAN RESERVATIONS.

(a) In General.--Section 4(b)(6)(F) of the Food and Nutrition Act of 2008 (7 U.S.C. 2013(b)(6)(F)) is amended by striking ``2012'' and inserting ``2018''.

(b) <<NOTE: 7 USC 2013 note.>> Feasibility Study, Report, and Demonstration Project for Indian Tribes.--

(1) Definitions.--In this subsection:

(A) Indian; indian tribe.--The terms ``Indian'' and ``Indian tribe'' have the meaning given the terms in section 4 of the Indian Self-Determination and Education Assistance Act (25 U.S.C. 450b).

(B) Tribal organization.--The term ``tribal organization'' has the meaning given the term in section 4 of the Indian Self-Determination and Education Assistance Act (25 U.S.C. 450b).

(2) Study.--The Secretary shall conduct a study to determine the feasibility of tribal administration of Federal food assistance programs, services, functions, and activities (or portions thereof), in lieu of State agencies or other administering entities.

[[Page 128 STAT. 786]]

(3) Report.--Not later than 18 months after the date of enactment of this Act, the Secretary shall submit to the Committee on Agriculture of the House of Representatives and the Committee on Agriculture, Nutrition, and Forestry of the Senate a report that--

(A) contains a list of programs, services, functions, and activities with respect to which it would be feasible to be administered by a tribal organization;

(B) a description of whether that administration would necessitate a statutory or regulatory change; and

(C) such other issues that may be determined by the Secretary and developed through consultation pursuant to paragraph (4).

(4) Consultation with indian tribes.--In developing the report required by paragraph (3), the Secretary shall consult with tribal organizations.

(5) Funding.--Out of any funds made available under section 18 for fiscal year 2014, the Secretary shall make available to carry out the study and report described in paragraphs (2) and (3) \$1,000,000, to remain available until expended.

(6) Traditional and local foods demonstration project.--

(A) In general.--Subject to the availability of appropriations, the Secretary shall pilot a demonstration project by awarding a grant to 1 or more tribal organizations authorized to administer the food distribution program on Indian reservations under section 4(b) of the Food and Nutrition Act of 2008 (7 U.S.C. 2013(b)) for the purpose of purchasing nutritious and traditional foods, and when practicable, foods produced locally by Indian producers, for distribution to recipients of foods distributed under that program.

(B) Administration.--The Secretary may award a grant on a noncompetitive basis to 1 or more tribal

organizations that have the administrative and financial capability to conduct a demonstration project, as determined by the Secretary.

(C) Consultation, technical assistance, and training.--During the implementation phase of the demonstration project, the Secretary shall consult with Indian tribes and provide outreach to Indian farmers, ranchers, and producers regarding the training and capacity to participate in the demonstration project.

(D) Funding.--

(i) Authorization of appropriations.--There is authorized to be appropriated to carry out this section \$2,000,000 for each of fiscal years 2014 through 2018.

(ii) Relationship to other authorities.--The funds and authorities provided under this subparagraph are in addition to any other funds or authorities the Secretary may have to carry out activities described in this paragraph.



NATIONAL CONGRESS OF AMERICAN INDIANS

The National Congress of American Indians Resolution #ANC-14-054

TITLE: Call upon Food and Nutrition Service to Remedy Food Shortages in the Food Distribution on Indian Reservations Program and Purchase Traditional Foods for Food Packages

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Haliwa-Saponi Indian Tribe

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Stephen Smith
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SOUTHWEST
Manuel Heart
Ute Mountain Ute Tribe

WESTERN
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WHEREAS, we, the members of the National Congress of American Indians of the United States, invoking the divine blessing of the Creator upon our efforts and purposes, in order to preserve for ourselves and our descendants the inherent sovereign rights of our Indian nations, rights secured under Indian treaties and agreements with the United States, and all other rights and benefits to which we are entitled under the laws and Constitution of the United States, to enlighten the public toward a better understanding of the Indian people, to preserve Indian cultural values, and otherwise promote the health, safety and welfare of the Indian people, do hereby establish and submit the following resolution; and

WHEREAS, the National Congress of American Indians (NCAI) was established in 1944 and is the oldest and largest national organization of American Indian and Alaska Native tribal governments; and

WHEREAS, diet-related diseases including diabetes, cardiovascular disease, and obesity are near epidemic proportions on most Indian reservations; and

WHEREAS, American Indian and Alaska Native citizens in over 270 tribes rely on the Food Distribution Program on Indian Reservation (FDPIR) food packages to meet their daily food needs and FDPIR has seen a sustained rise in participants since October 2013; and

WHEREAS, the sustained rise of participants in the program, coupled with the budget and management of the FDPIR program, has caused irregular food purchases and shortages of foods normally available in the food package; and

WHEREAS, our traditional foods have great potential to address the current health conditions of American Indian and Alaska Native citizens and that it is important that FDPIR participants have access to the traditional foods for their health, well-being, and nutrition; and

WHEREAS, the Congress, through the 2014 Agricultural Act and the previous Farm Bills has authorized the purchase of traditional foods in the FDPIR program.

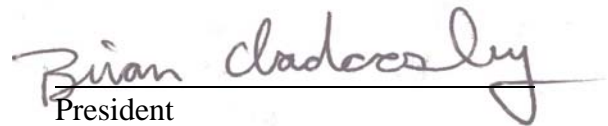
NOW THEREFORE BE IT RESOLVED, that the NCAI does hereby call on the U.S. Department of Agriculture (USDA) to immediately and completely restore FDPIR food packages and that USDA use all available authorities to ensure that food shortages are immediately remedied and that currently unavailable foods be secured for the food package for FDPIR; and

BE IT FURTHER RESOLVED, that NCAI additionally calls for all traditional foods to become a permanent part of the FDPIR food package and that those foods be purchased from Native American-owned companies and producers; and

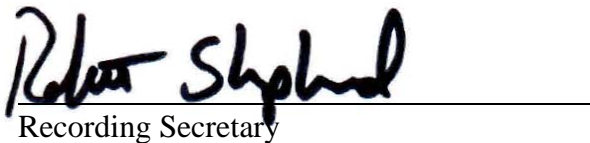
BE IT FINALLY RESOLVED, that this resolution shall be the policy of NCAI until it is withdrawn or modified by subsequent resolution.

CERTIFICATION

The foregoing resolution was adopted by the General Assembly at the 2014 Mid-Year Session of the National Congress of American Indians, held at the Dena'ina Civic & Convention Center, June 8-11, 2014 in Anchorage, Alaska, with a quorum present.


President

ATTEST:


Recording Secretary

Health Promotion and Diabetes Prevention in American Indian and Alaska Native Communities — Traditional Foods Project, 2008–2014

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Larry Alonso, MSN
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Summary

Type 2 diabetes was probably uncommon in American Indian and Alaska Native (AI/AN) populations before the 1940s. During 2010–2012, AI/AN adults were approximately 2.1 times as likely to have diabetes diagnosed as non-Hispanic white adults. Although type 2 diabetes in youth is still uncommon, AI/AN youth (aged 15–19 years) experienced a 68% increase in diagnosed diabetes from 1994 to 2004. Health disparities are related to biological, environmental, sociological, and historical factors. This report highlights observations from the Traditional Foods Project (2008–2014) that illustrate tribally driven solutions, built on traditional ecological knowledge, to reclaim food systems for health promotion and prevention of chronic illnesses, including diabetes.

Introduction

Before the 1940s, diabetes was probably uncommon among American Indians/Alaska Natives (AI/AN) (1). In 1940, only 21 cases of diabetes were identified among the Akimel O'odham people (Pima) living in the Sonoran Desert on the Gila River (2). In 2006, 38% of Akimel O'odham adults aged ≥ 20 years had type 2 diabetes (3). In 2001, one in 359 Navajo youth aged 15–19 years had diabetes and one in 2,542 developed diabetes annually (4).

During 2010–2012, AI/AN adults aged ≥ 20 years were 2.1 times as likely to have diabetes diagnosed compared with non-Hispanic white adults (15.9% versus 7.6% respectively) (5). The age-adjusted rate of diagnosed diabetes among AI/AN adults varied by region from 6.0% among Alaska Natives to 24.1% among American Indians in southern Arizona (5). From 1994 to 2004, diagnosed diabetes rates increased 68% among AI/AN youth aged 15–19 (6) and 100% from 1994 to 2007 among AI/AN young adults aged 18–34 (7). Young persons who develop type 2 diabetes are at risk for diabetes-related complications, including end-stage renal disease (ESRD), while they are young adults (8). During 2013–2014, approximately 17.5% of youth aged 2–19 years were obese, a risk factor for type 2 diabetes, which has remained about the same since 2003–2004 (9). In 2009, 20.7% of AI/AN children aged 2–4 years were obese (10).

CDC's Office of Minority Health and Health Equity selected the Traditional Foods Project's thematic analysis and discussion to provide an example of a program that builds awareness of health disparities and tribally driven solutions to address health promotion and diabetes prevention by reclaiming their

traditional food systems and related physical activity and social support. Criteria for selecting this project are described in the Background and Rationale for this supplement (11).

Diabetes and Social Determinants of Health

Biologic explanations for disproportionate burdens of chronic illness, though strong and predictive, tend to focus on the behaviors of individuals rather than the risk-laden social conditions (e.g., income distributions and violation of human rights) that contributed to their development in the first place (12,13). For diseases such as diabetes, attention to the social history is as important as learning the natural history (14). Physiologic stress responses have been associated with historical trauma (i.e., cumulative emotional and psychological wounding across generations, including the lifespan, which emanates from massive group trauma) (15) and adverse childhood experiences (ACE) (e.g., abuse and neglect, and serious household dysfunction, and premature death of a family member) (16). The ACE Study, a collaboration between CDC and Kaiser Permanente's Health Appraisal Clinic in San Diego, is one of the largest investigations ever conducted to assess associations between childhood maltreatment and later-life health and well-being (16), including obesity (17–19) and chronic disease (20). Research has identified links between physiologic stress responses in childhood and neurologic changes to the brain that can affect the complex web of causation for chronic diseases and other threats (21–23).

Social determinants of health (SDOH) are defined as the conditions in which persons are born, grow, live, work, worship, and age that affect a wide range of health, functioning, and quality-of-life outcomes (24). SDOH include social, economic, and physical environments as “place,” conditions that include economic stability, education, access to healthy foods, health care, patterns of social engagement, and sense of security and of well-being (24).

In 2010, an estimated 23% of Native American families earned incomes below the poverty line (25), a SDOH linked to “place” (24). Food insecurity, defined as uncertain or limited access to enough foods for an active healthy life because of a lack of money or resources, affected 28% of Native households with children in 2008, compared with 16% of U.S. households with children (26). Researchers have linked food insecurity to obesity in households with children (27), diabetes in adults (28), and poor glucose control for adults who have diabetes (29,30). Food insecurity is found on many reservations where food deserts (i.e., rural, low-income residents must travel more than 10 miles to access supermarkets or grocery stores) are prevalent (31–33). On a reservation in the Great Plains, 40% of families with children were food insecure. Much of the food available in homes was purchased at convenience stores on or near the reservation (33).

A first step in creating systemic, long-term changes to redress imbalances and promote health in AI/AN communities is to build awareness of the complexities regarding the historic and contemporary context of policy, poverty, historical trauma, and food systems related to health disparities, including diabetes disparities (34). Innovative models will likely be informed by traditional ecological knowledge, a natural science grounded in lifetimes of observation, experimentation, and adaptation (35).

The Land — Place — as a Social Determinant of Health and of Tribally Governed Solutions

Disruption of indigenous persons’ relationships with their homelands, including land, language, culture, and religious beliefs, has been suggested to be “at the root of health disparities” (36). Certain public health leaders have noted that this connection to health disparities, including the diabetes epidemic in Native populations, has received little attention (37,38). Indigenous persons had traditionally gathered and cultivated plants and hunted and fished on their lands (39). Even with the restricted access to their fertile lands through policy changes, including the reservation era, many tribes maintained a high-fiber diet based on traditional foods that fueled a physically active life (39,40). However, industrial

developments beginning in the mid-1900s on some tribal lands have further limited tribes’ ability to harvest their traditional foods and curtailed the associated physical activity (39).

For centuries, the Pima-Maricopa and Akimel O’odham people had channeled the waters of the Gila and Salt Rivers in the Sonoran Desert in Arizona through irrigation systems that secured their foods (e.g., drought-hardy tepary beans and prickly pear cactus). By the 1950s, the rivers had been diverted for ranches and construction of the Coolidge Dam, and the land became unsuitable for farming (41). By 2006, 38% of adults aged ≥ 20 years had type 2 diabetes, a rate 5.5 times that of tribal people of the same heritage in Mexico (6.9%), who continued to farm and consume food cultivated for generations (3). Currently, O’odham people living in Arizona who consume a traditional diet are less likely to develop type 2 diabetes than their peers who eat a modern-day diet (42).

In the 1940s and 1950s, the bottomlands of the Missouri River on the Fort Berthold Reservation, home of the Three Affiliated Tribes (Mandan, Hidatsa, and Arikara) and seven other Native communities, were flooded to accommodate the waters of the Garrison Dam (43–46). Approximately one fourth of the population of the Standing Rock Tribe had to evacuate their homes before the flood of approximately 160,000 acres (44). Many local foods, (e.g., wild turnips, berries, beans, wildlife, and medicinal plants) were lost as the bottomlands were flooded (43–45). By 2000, the prevalence of diagnosed diabetes in the area was approximately three times the rate for non-Hispanic whites (47).

Values, including stewardship of natural resources of land and water, are reflected in tribes’ unique stories about their food systems (45,46). The importance of flowing water is a common teaching; “Water is life,” is often said in Native languages (48). In recent decades, many tribal nations are reclaiming the water and foods specific to their landscape, history, and culture (34,46,48). Tribal nations are part of a global food sovereignty movement that maintains the rights of all persons to define their own policies and strategies for sustainable food and agriculture systems. La Via Campesina, the International Indian Treaty Rights Council, and allies catalyzed the movement in the 1990s, presenting a declaration to the United Nations, which also stated that food sovereignty is a necessary condition to assure food security (49–51).

History of the Traditional Foods Project

In response to the epidemic of diabetes among Native persons, in 1997, Congress passed the Balanced Budget Amendment (Law 105–33) establishing the Special Diabetes Program for

Indians (SDPI) (52), administered by IHS and guided by their Tribal Leaders Diabetes Committee (TLDC). During 1999–2000, approximately 400 tribal members representing 171 tribal nations helped inform planning. Their suggestions included creating stories for children about preventing diabetes, since there were few stories because diabetes had been largely unknown until recent decades, and incorporating traditional knowledge and culture alongside Western medicine (48).

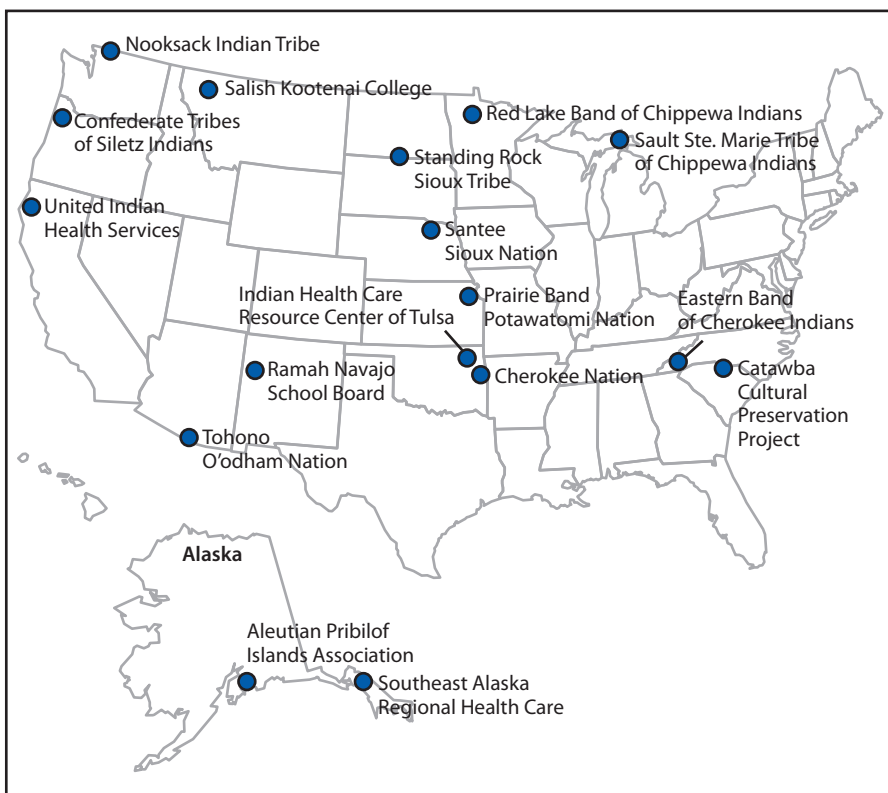
Reports document encouraging health trends since SDPI was established in 1998, including sustained improvements in glucose and blood pressure control and reduced incidence of ESRD (53–55). From 2001 to 2013, ESRD prevalence among AI/ANs declined 29%, the only instance of a significant decline in prevalence for a major racial group since ESRD care was implemented in 1973 (55).

CDC's National Diabetes Prevention Center, established in 1998 in part to complement the work of SDPI, was reorganized and named the Native Diabetes Wellness Program (NDWP) in 2004. Principles of practice were integral to program operations (48), including concepts of cultural humility (56) and tribally driven, community-based participatory approaches (57–59). In 2006, NDWP, in collaboration with IHS and TLDC, introduced the *Eagle Books* series for young children. The stories highlight the wisdom of traditional ways of health (e.g., harvesting healthy foods, physical activity, gratitude, generosity, stewardship, and courage) through the voices of animals (e.g., a wise eagle, garden-loving rabbit, and clever coyote) engaged in dialogue with eager-to-learn children (48,60). The early grades (K–4) of the Diabetes Education in Tribal Schools (DETS) K–12 curriculum, *Health is Life in Balance*, led by the National Institutes of Health, CDC, IHS, and eight Tribal colleges and universities, features the *Eagle Books* stories. The DETS curriculum embeds the “5 E’s” of educational instruction (i.e., engagement, exploration, explanation, elaboration, and evaluation) (61,62).

In 2008, CDC announced a 5-year funding opportunity entitled *Using Traditional Foods and Sustainable Ecological Approaches to Promote Health and Help Prevent Diabetes in American Indian and Alaska Native Communities* (i.e., Traditional Foods Project) informed by tribal leaders and earlier programming about the resonance of increasing traditional foods access with health promotion efforts (63). The project proposed

to 1) support sustainable and evaluable ecologic approaches to reclaim traditional foods and physical activity; 2) encourage local practices that increase access to local foods and physical activity; 3) revive and create stories of healthy traditional ways to be remembered, retold, and talked about in homes, schools, and communities; and 4) engage community members to track success, participate in health promotion activities, explore diabetes in context with community history, and share stories of hope (e.g., radio, print, social media, and digital stories). Supported by funding from IHS following approval by TLDC and operations support from CDC, NDWP launched the Traditional Foods Project with 11 cooperative agreements with diverse tribal communities in September 2008. Additional funding was allocated by CDC in 2009, enabling the addition of more partners (Figure). Traditional Foods Project partners each received \$100,000 per year to implement their local programs. In 2012 and 2013, Traditional Foods Project partners and NDWP staff were invited to present to the CDC Tribal Advisory Committee, which recommended continuing the Traditional Foods Project for a year beyond the 5-year cycle. Partners applied for a sixth year of funding for 2014 by demonstrating their evaluation results and plans to sustain their native food systems.

FIGURE. Location of Traditional Foods Project partners



Methods

NDWP collaborated with Traditional Foods Project partners to evaluate the process (“how do we do this work effectively?”), methods (“how do we measure interventions to reclaim food systems in relation to health?”), and environmental outcomes (increased and sustained accessibility of traditional local healthy foods, physical activity and social support in relation to health) of the Traditional Foods Project. Quantitative data included measures of access to traditional foods, physical activity, and social support over time.

Ethnographic and qualitative data from tribal partner presentations, partner collaborations, monthly conference calls, and annual meetings described each programs’ maturation, strategy development, accomplishments, barriers encountered, and adaptations made. Data reported by partners at 6-month intervals through the Traditional Foods Project’s conclusion in September 2014 were gathered using Office of Management and Budget-approved shared data elements, an aggregate data evaluation tool; results are being analyzed by CDC.

Discussion

Early observations gleaned from this multifaceted evaluation and preliminary CDC analysis of the tool are promising. These observations include:

- **Significance of land:** Recognition of the importance of the land holds deep meaning for tribal members. Working with the land, or Mother Earth, is considered an honorable activity (64). This grounding observation was manifested as partners worked to strengthen tribal self-governance to secure land that helped to revive and sustain food systems and preserve subsistence practices and their homelands. Many programs provided workshops on cooking, hunting, gathering, fishing, and preserving foods and environmental stewardship.
- **Interest in Native American food pathways and foodsheds:** Tribal communities are leading a food sovereignty movement in North America to revive the foods specific to the landscape, history, and culture of their people (45). During the 6 years of the Traditional Foods Project (2008–2014), the momentum grew locally and nationally as partners aligned their efforts with the 2008 Farm Bill and created opportunities to operationalize the Agricultural Act of 2014 (65) related to the service of traditional foods in public facilities and the U.S. Department of Agriculture (USDA) Food Distribution Program on Indian Reservations (FDPIR), nutrition education, and physical activity (66). The momentum of the food sovereignty movement continued to grow as

partners shared experiences and stories with other tribal programs. For example, *Qaqamiigux: Traditional Foods and Recipes from the Aleutian and Pribilof Islands* was published in 2014 by the Aleutian Pribilof Islands Association, a Traditional Foods Project partner (67).

- **Respect for traditional knowledge:** Wisdom to adapt to changing conditions, including rebuilding food systems that worked for thousands of years, is inherent in traditional ecologic knowledge. Persons develop traditional knowledge through direct personal experience with the land and its interrelationships. The knowledge is communicated orally and validated by generations who successfully manage “the commons” of shared land, language, foods, and culture (35).
- **Consistency with traditional values:** Messages and approaches grounded in traditional ways of knowing about health are consistent with cultural values. Values are reinforced through storytelling, gratitude for the gifts of the earth, and generosity in sharing harvested foods throughout communities. Stories and practices of gathering, growing, and harvesting with families are often remembered and shared, contributing to the description of persons’ homelands as “resilient places of remembrance” (68).
- **The role of elders as teachers of traditional knowledge fosters intergenerational relationships:** Elders served as advisors to help guide program development. They taught traditional subsistence practices to youth, often naming foods and activities in their tribal language. The engagement of elders and youth strengthened social connections.
- **Traditional foods facilitate dialogue about health.** Partners agreed that traditional foods activities are a way to discuss health in tribal communities. Community members were drawn to messaging and activities that involved growing, harvesting, and preparing foods; sharing stories and traditional ecological knowledge; playing traditional games and dancing; and participating in talking circles. Educational materials that connect harvesting and consuming traditional foods to promoting health were created or adapted, including calendars of seasonal foods, posters, and lesson plans. The medicine wheel nutrition intervention was tailored by several programs to illustrate the story of their food systems (46,69).
- **Emphasis on education:** Sharing traditional foods recipes, cooking and preparing foods, participating in hands-on food demonstrations, and taste tests created learning opportunities in schools and clubs. Children experienced traditional foods as school cafeteria staples and commodity foods available through FDPIR. Some programs educated tribal members and interested allies (e.g., state and local

government officials) about food sovereignty, engaging interested youth in creating digital stories about their work. To gather background to inform interventions, as well as to engage communities, one program developed a family meal survey that informed their food preparation educational sessions and was shared with partners. Several programs used the Food Sovereignty Assessment Tool developed by the First Nations Development Institute (70).

- **Community-driven planning:** Communities determined their needs and approaches with the help of advisory boards, community needs assessments and focus groups, interviews, and surveys among community members.
- **Sustained efforts beyond the project's end:** Programs sustained elements of their work after the cooperative agreement ended in September, 2014. Several programs secured support through their tribal councils to continue positions established by their program; several were awarded grants and contracts from university partnerships, state and county health departments, federal agencies (e.g., USDA and IHS), and nonprofit organizations.

Conclusion

Community collaboration to increase access to traditional foods, physical activity, and social support might have the potential to advance health initiatives across agencies and the country. For example, in 2011, Traditional Foods Project's partners offered insight to the Bureau of Indian Education as they developed their School Health and Wellness Policy supporting the provision for "healthy traditional and cultural foods" (71). Tribal schools also are providing hands-on learning activities about growing healthy foods. Sustainability of these activities is strengthened by local and national efforts, including the Farm to School initiative (72).

Native communities across the country are applying their traditional ecological knowledge, specific to the history and culture of their tribe, to protect their homelands of land, language, culture, memory, and traditional foods practices. Sharing and documenting food sovereignty efforts continues to be a priority. A collection of stories told by tribes about their traditional foods systems is published on the NDWP website (47). Underpinning the stories are long-sighted lessons for sustainability, steeped in cultural significance and emotional attachment (68) and inspired by agency (i.e., capacity of acting or of exerting power), self-determination, and hope, for the health of the people.

Acknowledgments

The CDC Native Diabetes Wellness Program recognizes the 17 tribal Traditional Foods Project partners that formed the cornerstone of the CDC Traditional Foods Project (2008–2014) program described in this report:

Aleutian Pribilof Islands Association (Alaska), The Aleut Diet Program; Catawba Cultural Preservation Project (South Carolina), Catawba Lifestyle and Gardening Project; Cherokee Nation (Oklahoma), Cherokee Nation Healthy Nation/Foods Project; Confederated Tribes of Siletz Indians (Oregon), Siletz Healthy Traditions Project; Eastern Band of Cherokee Indians (North Carolina), Healthy Roots for Healthy Futures; Indian Health Care Resource Center of Tulsa (Oklahoma), Building Community—Strengthening Traditional Ties; Nooksack Indian Tribe (Washington), Listen to the Elders: Healing Nooksack Health Through History; Prairie Band Potawatomi Nation (Kansas), Return to a Healthy Past; Ramah Navajo School Board (New Mexico), Empowering Ramah Navajo to Eat Healthy by Using Traditional Foods; Red Lake Band of Chippewa Indians (Minnesota), Old Ways for Today's Health; Salish Kootenai College (Montana), Traditional Living Challenge and Ancestor's Choice; Santee Sioux Nation (Nebraska), Wiconi Unki Tawapi—Healing Our Lives; Sault Ste. Marie Tribe of Chippewa Indians (Michigan), Uniting to Create Traditional and Healthy Environments; Southeast Alaska Regional Health Care Consortium (Alaska), WISEFAMILIES Through Customary and Traditional Living; Standing Rock Sioux Tribe (North Dakota and South Dakota), Native Gardens Project: An Indigenous Permaculture Approach to the Prevention and Treatment of Diabetes; Tohono O'odham Community Action (Arizona), O'odham Ha'icu Ha-Hugi c Duakog; Tohonoo O'odham Food, Fitness & Wellness Initiative Project; United Indian Health Services (California), Food is Good Medicine.

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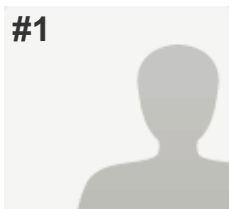
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Traditional Foods Survey 1

#1



COMPLETE

Collector: Web Link 1 (Web Link)

Started: Wednesday, June 25, 2014 7:34:29 AM

Last Modified: Wednesday, June 25, 2014 7:36:54 AM

Time Spent: 00:02:25

IP Address: 70.37.212.196

PAGE 1

Q1: What region do you represent?

Mountain Plains Region

Q2: Which of the following Native foods would your FDPIR program want in your regular food package from FNS? Choose all that apply.

Frozen Ground Bison, Wild Rice

Q3: USDA has an approved vendor to supply frozen ground bison. How much bison would you need as part of USDA deliveries? Please specify your average take rate in cases (40-1 lb packages).

20



Q4: When USDA has approved the vendors for the other products listed above, what would your average monthly take rate be?

Wild Rice (in cases of 40 units)

10

Q5: Would you like all the Native food items mentioned (bison, salmon, blue cornmeal, wild rice) to be delivered on a year-round basis?

Yes

Traditional Foods Survey 1

#2



COMPLETE

Collector: Web Link 1 (Web Link)

Started: Wednesday, June 25, 2014 7:39:47 AM

Last Modified: Wednesday, June 25, 2014 7:42:08 AM

Time Spent: 00:02:21

IP Address: 50.200.234.146

PAGE 1

Q1: What region do you represent?

Western Region

Q2: Which of the following Native foods would your FDPIR program want in your regular food package from FNS? Choose all that apply.

Frozen Ground Bison, Salmon

Q3: USDA has an approved vendor to supply frozen ground bison. How much bison would you need as part of USDA deliveries? Please specify your average take rate in cases (40-1 lb packages).

small program not much--3-4 cases a month.

Q4: When USDA has approved the vendors for the other products listed above, what would your average monthly take rate be?

Salmon (in cases of 40 units)

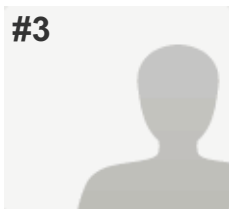
depnds on what kind it is

Q5: Would you like all the Native food items mentioned (bison, salmon, blue cornmeal, wild rice) to be delivered on a year-round basis?

Yes

Traditional Foods Survey 1

#3



COMPLETE

Collector: Web Link 1 (Web Link)

Started: Wednesday, June 25, 2014 7:27:38 AM

Last Modified: Wednesday, June 25, 2014 7:44:06 AM

Time Spent: 00:16:28

IP Address: 66.142.195.205

PAGE 1

Q1: What region do you represent?

Southwest Region

Q2: Which of the following Native foods would your FDPIR program want in your regular food package from FNS? Choose all that apply.

Frozen Ground Bison, Salmon, Blue Cornmeal,
Wild Rice,
Other (please specify) Salmon- not canned

Q3: USDA has an approved vendor to supply frozen ground bison. How much bison would you need as part of USDA deliveries? Please specify your average take rate in cases (40-1 lb packages).

if issuance is one per -300 cases per month initially

Q4: When USDA has approved the vendors for the other products listed above, what would your average monthly take rate be?

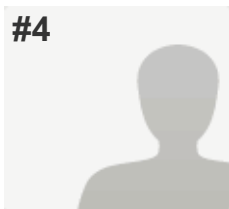
Salmon (in cases of 40 units)	200 if frozen
Blue Cornmeal (in cases of 40 units)	12
Wild Rice (in cases of 40 units)	30

Q5: Would you like all the Native food items mentioned (bison, salmon, blue cornmeal, wild rice) to be delivered on a year-round basis?

No

Traditional Foods Survey 1

#4



COMPLETE

Collector: Web Link 1 (Web Link)

Started: Wednesday, June 25, 2014 7:45:45 AM

Last Modified: Wednesday, June 25, 2014 7:50:43 AM

Time Spent: 00:04:58

IP Address: 67.212.212.167

PAGE 1

Q1: What region do you represent?

Midwest Region

Q2: Which of the following Native foods would your FDPIR program want in your regular food package from FNS? Choose all that apply.

Wild Rice

Q3: USDA has an approved vendor to supply frozen ground bison. How much bison would you need as part of USDA deliveries? Please specify your average take rate in cases (40-1 lb packages).

15 cases for a 3 month period

Q4: When USDA has approved the vendors for the other products listed above, what would your average monthly take rate be?

Salmon (in cases of 40 units)

1

Blue Cornmeal (in cases of 40 units)

2

Wild Rice (in cases of 40 units)

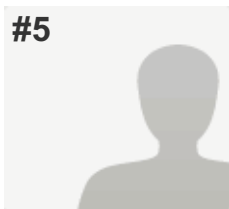
15 cases in a 3 month period

Q5: Would you like all the Native food items mentioned (bison, salmon, blue cornmeal, wild rice) to be delivered on a year-round basis?

Yes

Traditional Foods Survey 1

#5



COMPLETE

Collector: Web Link 1 (Web Link)

Started: Wednesday, June 25, 2014 7:50:38 AM

Last Modified: Wednesday, June 25, 2014 7:53:18 AM

Time Spent: 00:02:40

IP Address: 75.133.72.2

PAGE 1

Q1: What region do you represent?

Midwest Region

Q2: Which of the following Native foods would your FDPIR program want in your regular food package from FNS? Choose all that apply.

Frozen Ground Bison, Wild Rice

Q3: USDA has an approved vendor to supply frozen ground bison. How much bison would you need as part of USDA deliveries? Please specify your average take rate in cases (40-1 lb packages).

4 case's ev. 3 months

Q4: When USDA has approved the vendors for the other products listed above, what would your average monthly take rate be?

Wild Rice (in cases of 40 units)

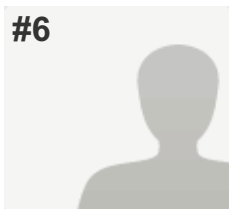
2 case's ev. 3 months

Q5: Would you like all the Native food items mentioned (bison, salmon, blue cornmeal, wild rice) to be delivered on a year-round basis?

Yes

Traditional Foods Survey 1

#6



COMPLETE

Collector: Web Link 1 (Web Link)

Started: Wednesday, June 25, 2014 7:49:59 AM

Last Modified: Wednesday, June 25, 2014 7:53:58 AM

Time Spent: 00:03:59

IP Address: 75.121.149.125

PAGE 1

Q1: What region do you represent?

Midwest Region

Q2: Which of the following Native foods would your FDPIR program want in your regular food package from FNS? Choose all that apply.

Frozen Ground Bison, Wild Rice

Q3: USDA has an approved vendor to supply frozen ground bison. How much bison would you need as part of USDA deliveries? Please specify your average take rate in cases (40-1 lb packages).

5 cases/monthly

Q4: When USDA has approved the vendors for the other products listed above, what would your average monthly take rate be?

Wild Rice (in cases of 40 units)

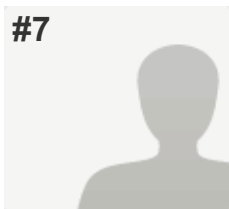
5 cases/monthly

Q5: Would you like all the Native food items mentioned (bison, salmon, blue cornmeal, wild rice) to be delivered on a year-round basis?

Yes

Traditional Foods Survey 1

#7



COMPLETE

Collector: Web Link 1 (Web Link)

Started: Wednesday, June 25, 2014 8:02:56 AM

Last Modified: Wednesday, June 25, 2014 8:08:47 AM

Time Spent: 00:05:51

IP Address: 71.87.22.226

PAGE 1

Q1: What region do you represent?

Midwest Region

Q2: Which of the following Native foods would your FDPIR program want in your regular food package from FNS? Choose all that apply.

Frozen Ground Bison, Salmon, Wild Rice,
Other (please specify) frozen Berries

Q3: USDA has an approved vendor to supply frozen ground bison. How much bison would you need as part of USDA deliveries? Please specify your average take rate in cases (40-1 lb packages).

at least 20 cases a month

Q4: When USDA has approved the vendors for the other products listed above, what would your average monthly take rate be?

Salmon (in cases of 40 units)

about 5 cases a month

Wild Rice (in cases of 40 units)

around 15 cases a month

Other (Please specify)

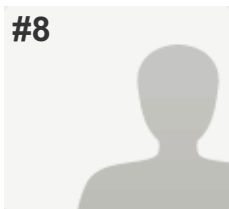
10 cases a month

Q5: Would you like all the Native food items mentioned (bison, salmon, blue cornmeal, wild rice) to be delivered on a year-round basis?

Yes

Traditional Foods Survey 1

#8



COMPLETE

Collector: Web Link 1 (Web Link)

Started: Wednesday, June 25, 2014 8:05:10 AM

Last Modified: Wednesday, June 25, 2014 8:10:45 AM

Time Spent: 00:05:35

IP Address: 96.2.187.34

PAGE 1

Q1: What region do you represent?

Midwest Region

Q2: Which of the following Native foods would your FDPIR program want in your regular food package from FNS? Choose all that apply.

Wild Rice,
Other (please specify)
Natural Wild Rice is the healthiest.

Q3: USDA has an approved vendor to supply frozen ground bison. How much bison would you need as part of USDA deliveries? Please specify your average take rate in cases (40-1 lb packages).

40 cases a month

Q4: When USDA has approved the vendors for the other products listed above, what would your average monthly take rate be?

Wild Rice (in cases of 40 units)

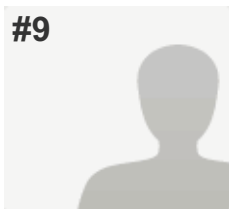
30 cases a month depending on pond size
1# or 2#

Q5: Would you like all the Native food items mentioned (bison, salmon, blue cornmeal, wild rice) to be delivered on a year-round basis?

Yes

Traditional Foods Survey 1

#9



COMPLETE

Collector: Web Link 1 (Web Link)

Started: Wednesday, June 25, 2014 8:11:39 AM

Last Modified: Wednesday, June 25, 2014 8:13:25 AM

Time Spent: 00:01:46

IP Address: 69.178.234.87

PAGE 1

Q1: What region do you represent?

Mountain Plains Region

Q2: Which of the following Native foods would your FDPIR program want in your regular food package from FNS? Choose all that apply.

Frozen Ground Bison, Wild Rice

Q3: USDA has an approved vendor to supply frozen ground bison. How much bison would you need as part of USDA deliveries? Please specify your average take rate in cases (40-1 lb packages).

30 cases per month

Q4: When USDA has approved the vendors for the other products listed above, what would your average monthly take rate be?

Salmon (in cases of 40 units)

Canned or fresh???

Wild Rice (in cases of 40 units)

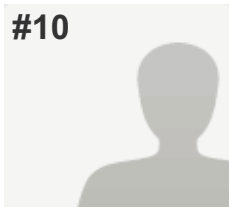
25

Q5: Would you like all the Native food items mentioned (bison, salmon, blue cornmeal, wild rice) to be delivered on a year-round basis?

Yes

Traditional Foods Survey 1

#10



COMPLETE

Collector: Web Link 1 (Web Link)

Started: Wednesday, June 25, 2014 8:23:44 AM

Last Modified: Wednesday, June 25, 2014 8:27:55 AM

Time Spent: 00:04:11

IP Address: 99.162.156.190

PAGE 1

Q1: What region do you represent?

Western Region

Q2: Which of the following Native foods would your FDPIR program want in your regular food package from FNS? Choose all that apply.

Frozen Ground Bison, Salmon, Blue Cornmeal,
Wild Rice,
Other (please specify) frozen salmon, not canned

Q3: USDA has an approved vendor to supply frozen ground bison. How much bison would you need as part of USDA deliveries? Please specify your average take rate in cases (40-1 lb packages).

120 - 150 per month

Q4: When USDA has approved the vendors for the other products listed above, what would your average monthly take rate be?

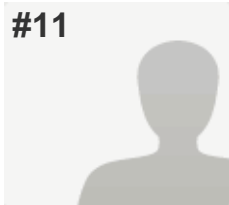
Salmon (in cases of 40 units)	160
Blue Cornmeal (in cases of 40 units)	20
Wild Rice (in cases of 40 units)	20

Q5: Would you like all the Native food items mentioned (bison, salmon, blue cornmeal, wild rice) to be delivered on a year-round basis?

Yes

Traditional Foods Survey 1

#11



COMPLETE

Collector: Web Link 1 (Web Link)

Started: Wednesday, June 25, 2014 8:39:49 AM

Last Modified: Wednesday, June 25, 2014 8:44:04 AM

Time Spent: 00:04:15

IP Address: 166.137.123.170

PAGE 1

Q1: What region do you represent?

Southwest Region

Q2: Which of the following Native foods would your FDPIR program want in your regular food package from FNS? Choose all that apply.

Frozen Ground Bison, Salmon, Blue Cornmeal, Wild Rice

Q3: USDA has an approved vendor to supply frozen ground bison. How much bison would you need as part of USDA deliveries? Please specify your average take rate in cases (40-1 lb packages).

30 cases

Q4: When USDA has approved the vendors for the other products listed above, what would your average monthly take rate be?

Salmon (in cases of 40 units)

3 cases

Blue Cornmeal (in cases of 40 units)

8 cases

Wild Rice (in cases of 40 units)

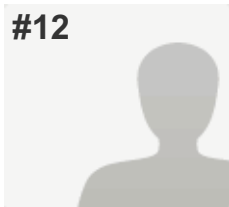
18 cases

Q5: Would you like all the Native food items mentioned (bison, salmon, blue cornmeal, wild rice) to be delivered on a year-round basis?

Yes

Traditional Foods Survey 1

#12



COMPLETE

Collector: Web Link 1 (Web Link)

Started: Wednesday, June 25, 2014 8:37:20 AM

Last Modified: Wednesday, June 25, 2014 8:45:00 AM

Time Spent: 00:07:40

IP Address: 4.53.178.206

PAGE 1

Q1: What region do you represent?

Western Region

Q2: Which of the following Native foods would your FDPIR program want in your regular food package from FNS? Choose all that apply.

Frozen Ground Bison, Salmon, Wild Rice,
Other (please specify) frozen salmon not canned

Q3: USDA has an approved vendor to supply frozen ground bison. How much bison would you need as part of USDA deliveries? Please specify your average take rate in cases (40-1 lb packages).

45 cases every other month

Q4: When USDA has approved the vendors for the other products listed above, what would your average monthly take rate be?

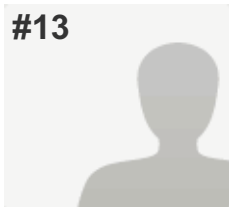
Salmon (in cases of 40 units)	10
Blue Cornmeal (in cases of 40 units)	5
Wild Rice (in cases of 40 units)	15

Q5: Would you like all the Native food items mentioned (bison, salmon, blue cornmeal, wild rice) to be delivered on a year-round basis?

Yes

Traditional Foods Survey 1

#13



COMPLETE

Collector: Web Link 1 (Web Link)

Started: Wednesday, June 25, 2014 8:34:33 AM

Last Modified: Wednesday, June 25, 2014 8:53:28 AM

Time Spent: 00:18:55

IP Address: 24.121.176.46

PAGE 1

Q1: What region do you represent?

Western Region

Q2: Which of the following Native foods would your FDPIR program want in your regular food package from FNS? Choose all that apply.

Frozen Ground Bison, Blue Cornmeal, Wild Rice

Q3: USDA has an approved vendor to supply frozen ground bison. How much bison would you need as part of USDA deliveries? Please specify your average take rate in cases (40-1 lb packages).

2 cases

Q4: When USDA has approved the vendors for the other products listed above, what would your average monthly take rate be?

Salmon (in cases of 40 units)

20-30 units

Blue Cornmeal (in cases of 40 units)

40 units

Wild Rice (in cases of 40 units)

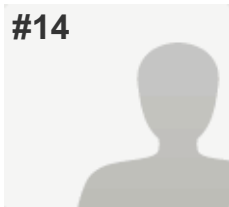
40 units

Q5: Would you like all the Native food items mentioned (bison, salmon, blue cornmeal, wild rice) to be delivered on a year-round basis?

No

Traditional Foods Survey 1

#14



COMPLETE

Collector: Web Link 1 (Web Link)

Started: Wednesday, June 25, 2014 8:55:05 AM

Last Modified: Wednesday, June 25, 2014 8:58:43 AM

Time Spent: 00:03:38

IP Address: 63.142.207.249

PAGE 1

Q1: What region do you represent?

Western Region

Q2: Which of the following Native foods would your FDPIR program want in your regular food package from FNS? Choose all that apply.

Frozen Ground Bison,
Other (please specify)
Give \$ to each region and let the region select their own

Q3: USDA has an approved vendor to supply frozen ground bison. How much bison would you need as part of USDA deliveries? Please specify your average take rate in cases (40-1 lb packages).

50 cases Give each region \$ & let them select

Q4: When USDA has approved the vendors for the other products listed above, what would your average monthly take rate be?

Other (Please specify)

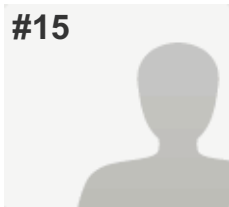
Give each region \$ and they select their native food items

Q5: Would you like all the Native food items mentioned (bison, salmon, blue cornmeal, wild rice) to be delivered on a year-round basis?

Yes

Traditional Foods Survey 1

#15



COMPLETE

Collector: Web Link 1 (Web Link)

Started: Wednesday, June 25, 2014 9:21:02 AM

Last Modified: Wednesday, June 25, 2014 9:23:18 AM

Time Spent: 00:02:16

IP Address: 63.131.184.74

PAGE 1

Q1: What region do you represent?

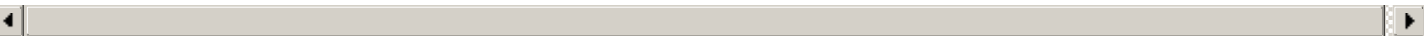
Mountain Plains Region

Q2: Which of the following Native foods would your FDPIR program want in your regular food package from FNS? Choose all that apply.

Frozen Ground Bison, Wild Rice

Q3: USDA has an approved vendor to supply frozen ground bison. How much bison would you need as part of USDA deliveries? Please specify your average take rate in cases (40-1 lb packages).

5 cases per month



Q4: When USDA has approved the vendors for the other products listed above, what would your average monthly take rate be?

Wild Rice (in cases of 40 units)

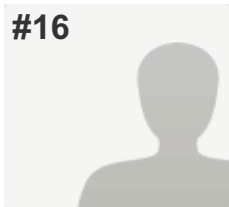
2 cases per month

Q5: Would you like all the Native food items mentioned (bison, salmon, blue cornmeal, wild rice) to be delivered on a year-round basis?

Yes

Traditional Foods Survey 1

#16



COMPLETE

Collector: Web Link 1 (Web Link)

Started: Wednesday, June 25, 2014 8:59:26 AM

Last Modified: Wednesday, June 25, 2014 9:36:10 AM

Time Spent: 00:36:44

IP Address: 12.207.176.178

PAGE 1

Q1: What region do you represent?

Southwest Region

Q2: Which of the following Native foods would your FDPIR program want in your regular food package from FNS? Choose all that apply.

Other (please specify) Pork; Dried Sweet Corn

Q3: USDA has an approved vendor to supply frozen ground bison. How much bison would you need as part of USDA deliveries? Please specify your average take rate in cases (40-1 lb packages).

50

Q4: When USDA has approved the vendors for the other products listed above, what would your average monthly take rate be?

Other (Please specify)

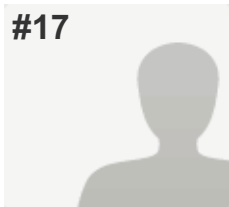
Pork 200 lbs month; Dried Sweet Corn 250 lbs month

Q5: Would you like all the Native food items mentioned (bison, salmon, blue cornmeal, wild rice) to be delivered on a year-round basis?

Yes

Traditional Foods Survey 1

#17



COMPLETE

Collector: Web Link 1 (Web Link)

Started: Wednesday, June 25, 2014 10:06:12 AM

Last Modified: Wednesday, June 25, 2014 10:17:19 AM

Time Spent: 00:11:07

IP Address: 24.121.112.40

PAGE 1

Q1: What region do you represent?

Western Region

Q2: Which of the following Native foods would your FDPIR program want in your regular food package from FNS? Choose all that apply.

Wild Rice

Q3: USDA has an approved vendor to supply frozen ground bison. How much bison would you need as part of USDA deliveries? Please specify your average take rate in cases (40-1 lb packages).

1 case...this item is not native to my tribe

Q4: When USDA has approved the vendors for the other products listed above, what would your average monthly take rate be?

Salmon (in cases of 40 units)

1

Blue Cornmeal (in cases of 40 units)

1

Wild Rice (in cases of 40 units)

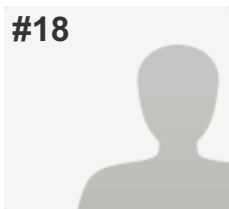
2

Q5: Would you like all the Native food items mentioned (bison, salmon, blue cornmeal, wild rice) to be delivered on a year-round basis?

No

Traditional Foods Survey 1

#18



COMPLETE

Collector: Web Link 1 (Web Link)

Started: Wednesday, June 25, 2014 10:29:02 AM

Last Modified: Wednesday, June 25, 2014 10:34:29 AM

Time Spent: 00:05:27

IP Address: 206.40.119.129

PAGE 1

Q1: What region do you represent?

Midwest Region

Q2: Which of the following Native foods would your FDPIR program want in your regular food package from FNS? Choose all that apply.

Frozen Ground Bison, Salmon, Wild Rice

Q3: USDA has an approved vendor to supply frozen ground bison. How much bison would you need as part of USDA deliveries? Please specify your average take rate in cases (40-1 lb packages).

25 cases per month.

Q4: When USDA has approved the vendors for the other products listed above, what would your average monthly take rate be?

Salmon (in cases of 40 units)

20 cs if frozen fillets.

Blue Cornmeal (in cases of 40 units)

None

Wild Rice (in cases of 40 units)

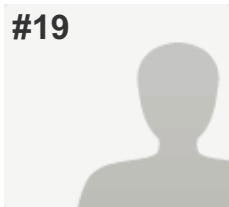
5 cs

Q5: Would you like all the Native food items mentioned (bison, salmon, blue cornmeal, wild rice) to be delivered on a year-round basis?

Yes

Traditional Foods Survey 1

#19



COMPLETE

Collector: Web Link 1 (Web Link)

Started: Wednesday, June 25, 2014 11:13:41 AM

Last Modified: Wednesday, June 25, 2014 11:27:39 AM

Time Spent: 00:13:58

IP Address: 12.228.144.162

PAGE 1

Q1: What region do you represent?

Southwest Region

Q2: Which of the following Native foods would your FDPIR program want in your regular food package from FNS? Choose all that apply.

Frozen Ground Bison, Wild Rice

Q3: USDA has an approved vendor to supply frozen ground bison. How much bison would you need as part of USDA deliveries? Please specify your average take rate in cases (40-1 lb packages).

30 cases a month

Q4: When USDA has approved the vendors for the other products listed above, what would your average monthly take rate be?

Salmon (in cases of 40 units)

none

Blue Cornmeal (in cases of 40 units)

none

Wild Rice (in cases of 40 units)

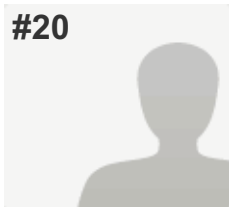
25 cases

Q5: Would you like all the Native food items mentioned (bison, salmon, blue cornmeal, wild rice) to be delivered on a year-round basis?

Yes

Traditional Foods Survey 1

#20



COMPLETE

Collector: Web Link 1 (Web Link)

Started: Wednesday, June 25, 2014 12:09:47 PM

Last Modified: Wednesday, June 25, 2014 12:11:07 PM

Time Spent: 00:01:20

IP Address: 74.214.218.230

PAGE 1

Q1: What region do you represent?

Mountain Plains Region

Q2: Which of the following Native foods would your FDPIR program want in your regular food package from FNS? Choose all that apply.

Frozen Ground Bison,
Other (please specify) Pork Chops

Q3: USDA has an approved vendor to supply frozen ground bison. How much bison would you need as part of USDA deliveries? Please specify your average take rate in cases (40-1 lb packages).

160-320 Cases Per Month

Q4: When USDA has approved the vendors for the other products listed above, what would your average monthly take rate be?

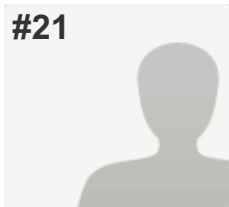
Salmon (in cases of 40 units)	20
Blue Cornmeal (in cases of 40 units)	40
Wild Rice (in cases of 40 units)	40
Other (Please specify)	80 Cases of Pork Chops Per Month

Q5: Would you like all the Native food items mentioned (bison, salmon, blue cornmeal, wild rice) to be delivered on a year-round basis?

Yes

Traditional Foods Survey 1

#21



COMPLETE

Collector: Web Link 1 (Web Link)

Started: Wednesday, June 25, 2014 12:39:21 PM

Last Modified: Wednesday, June 25, 2014 12:41:35 PM

Time Spent: 00:02:14

IP Address: 184.158.70.182

PAGE 1

Q1: What region do you represent?

Midwest Region

Q2: Which of the following Native foods would your FDPIR program want in your regular food package from FNS? Choose all that apply.

Frozen Ground Bison, Wild Rice

Q3: USDA has an approved vendor to supply frozen ground bison. How much bison would you need as part of USDA deliveries? Please specify your average take rate in cases (40-1 lb packages).

3

Q4: When USDA has approved the vendors for the other products listed above, what would your average monthly take rate be?

Wild Rice (in cases of 40 units)

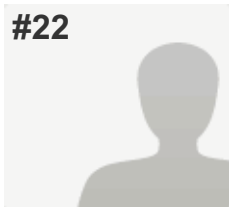
2

Q5: Would you like all the Native food items mentioned (bison, salmon, blue cornmeal, wild rice) to be delivered on a year-round basis?

Yes

Traditional Foods Survey 1

#22



COMPLETE

Collector: Web Link 1 (Web Link)

Started: Wednesday, June 25, 2014 12:59:16 PM

Last Modified: Wednesday, June 25, 2014 1:00:22 PM

Time Spent: 00:01:06

IP Address: 207.32.199.15

PAGE 1

Q1: What region do you represent?

Western Region

Q2: Which of the following Native foods would your FDPIR program want in your regular food package from FNS? Choose all that apply.

Frozen Ground Bison, Salmon, Wild Rice

Q3: USDA has an approved vendor to supply frozen ground bison. How much bison would you need as part of USDA deliveries? Please specify your average take rate in cases (40-1 lb packages).

40



Q4: When USDA has approved the vendors for the other products listed above, what would your average monthly take rate be?

Salmon (in cases of 40 units)

20

Wild Rice (in cases of 40 units)

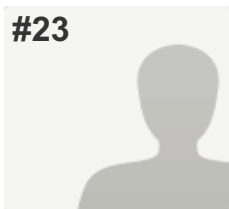
20

Q5: Would you like all the Native food items mentioned (bison, salmon, blue cornmeal, wild rice) to be delivered on a year-round basis?

Yes

Traditional Foods Survey 1

#23



COMPLETE

Collector: Web Link 1 (Web Link)

Started: Wednesday, June 25, 2014 1:53:56 PM

Last Modified: Wednesday, June 25, 2014 2:00:58 PM

Time Spent: 00:07:02

IP Address: 207.109.247.51

PAGE 1

Q1: What region do you represent?

Western Region

Q2: Which of the following Native foods would your FDPIR program want in your regular food package from FNS? Choose all that apply.

Frozen Ground Bison, Wild Rice

Q3: USDA has an approved vendor to supply frozen ground bison. How much bison would you need as part of USDA deliveries? Please specify your average take rate in cases (40-1 lb packages).

estimate 20-30 cases per month

Q4: When USDA has approved the vendors for the other products listed above, what would your average monthly take rate be?

Wild Rice (in cases of 40 units)

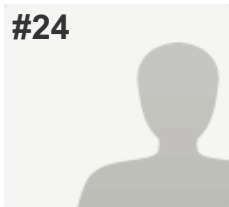
6 cases per month

Q5: Would you like all the Native food items mentioned (bison, salmon, blue cornmeal, wild rice) to be delivered on a year-round basis?

Yes

Traditional Foods Survey 1

#24



COMPLETE

Collector: Web Link 1 (Web Link)

Started: Wednesday, June 25, 2014 2:21:22 PM

Last Modified: Wednesday, June 25, 2014 2:22:59 PM

Time Spent: 00:01:37

IP Address: 67.58.28.206

PAGE 1

Q1: What region do you represent?

Southwest Region

Q2: Which of the following Native foods would your FDPIR program want in your regular food package from FNS? Choose all that apply.

Frozen Ground Bison, Salmon

Q3: USDA has an approved vendor to supply frozen ground bison. How much bison would you need as part of USDA deliveries? Please specify your average take rate in cases (40-1 lb packages).

1 case

Q4: When USDA has approved the vendors for the other products listed above, what would your average monthly take rate be?

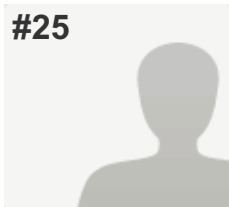
Salmon (in cases of 40 units)	10
Blue Cornmeal (in cases of 40 units)	10
Wild Rice (in cases of 40 units)	10

Q5: Would you like all the Native food items mentioned (bison, salmon, blue cornmeal, wild rice) to be delivered on a year-round basis?

Yes

Traditional Foods Survey 1

#25



COMPLETE

Collector: Web Link 1 (Web Link)

Started: Wednesday, June 25, 2014 2:21:35 PM

Last Modified: Wednesday, June 25, 2014 2:26:24 PM

Time Spent: 00:04:49

IP Address: 184.20.74.72

PAGE 1

Q1: What region do you represent?

Western Region

Q2: Which of the following Native foods would your FDPIR program want in your regular food package from FNS? Choose all that apply.

Frozen Ground Bison, Salmon

Q3: USDA has an approved vendor to supply frozen ground bison. How much bison would you need as part of USDA deliveries? Please specify your average take rate in cases (40-1 lb packages).

10

Q4: When USDA has approved the vendors for the other products listed above, what would your average monthly take rate be?

Salmon (in cases of 40 units)

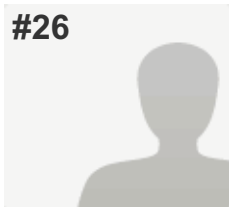
20

Q5: Would you like all the Native food items mentioned (bison, salmon, blue cornmeal, wild rice) to be delivered on a year-round basis?

Yes

Traditional Foods Survey 1

#26



COMPLETE

Collector: Web Link 1 (Web Link)

Started: Wednesday, June 25, 2014 2:45:51 PM

Last Modified: Wednesday, June 25, 2014 2:48:59 PM

Time Spent: 00:03:08

IP Address: 64.187.193.72

PAGE 1

Q1: What region do you represent?

Mountain Plains Region

Q2: Which of the following Native foods would your FDPIR program want in your regular food package from FNS? Choose all that apply.

Frozen Ground Bison, Salmon, Blue Cornmeal, Wild Rice

Q3: USDA has an approved vendor to supply frozen ground bison. How much bison would you need as part of USDA deliveries? Please specify your average take rate in cases (40-1 lb packages).

40

Q4: When USDA has approved the vendors for the other products listed above, what would your average monthly take rate be?

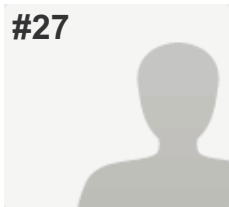
Salmon (in cases of 40 units)	40
Blue Cornmeal (in cases of 40 units)	40
Wild Rice (in cases of 40 units)	40
Other (Please specify)	40

Q5: Would you like all the Native food items mentioned (bison, salmon, blue cornmeal, wild rice) to be delivered on a year-round basis?

Yes

Traditional Foods Survey 1

#27



COMPLETE

Collector: Web Link 1 (Web Link)

Started: Wednesday, June 25, 2014 3:43:23 PM

Last Modified: Wednesday, June 25, 2014 3:45:51 PM

Time Spent: 00:02:28

IP Address: 208.54.168.204

PAGE 1

Q1: What region do you represent?

Southwest Region

Q2: Which of the following Native foods would your FDPIR program want in your regular food package from FNS? Choose all that apply.

Frozen Ground Bison, Wild Rice

Q3: USDA has an approved vendor to supply frozen ground bison. How much bison would you need as part of USDA deliveries? Please specify your average take rate in cases (40-1 lb packages).

30

Q4: When USDA has approved the vendors for the other products listed above, what would your average monthly take rate be?

Other (Please specify)

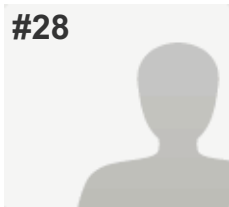
30

Q5: Would you like all the Native food items mentioned (bison, salmon, blue cornmeal, wild rice) to be delivered on a year-round basis?

Yes

Traditional Foods Survey 1

#28



COMPLETE

Collector: Web Link 1 (Web Link)

Started: Thursday, June 26, 2014 5:07:35 AM

Last Modified: Thursday, June 26, 2014 5:11:26 AM

Time Spent: 00:03:51

IP Address: 8.37.185.253

PAGE 1

Q1: What region do you represent?

Northeast Region

Q2: Which of the following Native foods would your FDPIR program want in your regular food package from FNS? Choose all that apply.

Frozen Ground Bison, Wild Rice

Q3: USDA has an approved vendor to supply frozen ground bison. How much bison would you need as part of USDA deliveries? Please specify your average take rate in cases (40-1 lb packages).

5

Q4: When USDA has approved the vendors for the other products listed above, what would your average monthly take rate be?

Wild Rice (in cases of 40 units)

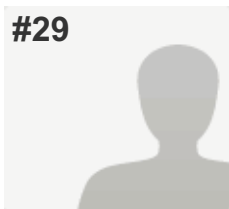
5

Q5: Would you like all the Native food items mentioned (bison, salmon, blue cornmeal, wild rice) to be delivered on a year-round basis?

Yes

Traditional Foods Survey 1

#29



COMPLETE

Collector: Web Link 1 (Web Link)

Started: Thursday, June 26, 2014 7:56:25 AM

Last Modified: Thursday, June 26, 2014 8:02:13 AM

Time Spent: 00:05:48

IP Address: 67.54.221.228

PAGE 1

Q1: What region do you represent?

Midwest Region

Q2: Which of the following Native foods would your FDPIR program want in your regular food package from FNS? Choose all that apply.

Frozen Ground Bison, Wild Rice

Q3: USDA has an approved vendor to supply frozen ground bison. How much bison would you need as part of USDA deliveries? Please specify your average take rate in cases (40-1 lb packages).

50 cases/mo - depending on the guide rate

Q4: When USDA has approved the vendors for the other products listed above, what would your average monthly take rate be?

Wild Rice (in cases of 40 units)

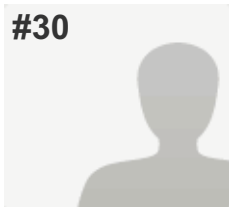
55 cases/mo if 2# per person, depending on guide rate

Q5: Would you like all the Native food items mentioned (bison, salmon, blue cornmeal, wild rice) to be delivered on a year-round basis?

No

Traditional Foods Survey 1

#30



COMPLETE

Collector: Web Link 1 (Web Link)

Started: Thursday, June 26, 2014 8:03:04 AM

Last Modified: Thursday, June 26, 2014 8:06:04 AM

Time Spent: 00:03:00

IP Address: 67.212.212.167

PAGE 1

Q1: What region do you represent?

Midwest Region

Q2: Which of the following Native foods would your FDPIR program want in your regular food package from FNS? Choose all that apply.

Frozen Ground Bison, Wild Rice

Q3: USDA has an approved vendor to supply frozen ground bison. How much bison would you need as part of USDA deliveries? Please specify your average take rate in cases (40-1 lb packages).

10 for a 3 month inventory

Q4: When USDA has approved the vendors for the other products listed above, what would your average monthly take rate be?

Salmon (in cases of 40 units)

2 per month

Blue Cornmeal (in cases of 40 units)

1 per month

Wild Rice (in cases of 40 units)

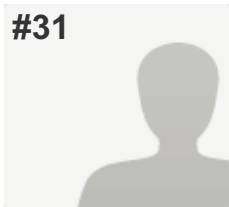
15 cases for 3 month inventory

Q5: Would you like all the Native food items mentioned (bison, salmon, blue cornmeal, wild rice) to be delivered on a year-round basis?

Yes

Traditional Foods Survey 1

#31



COMPLETE

Collector: Web Link 1 (Web Link)

Started: Thursday, June 26, 2014 8:18:27 AM

Last Modified: Thursday, June 26, 2014 8:21:30 AM

Time Spent: 00:03:03

IP Address: 74.221.48.166

PAGE 1

Q1: What region do you represent?

Midwest Region

Q2: Which of the following Native foods would your FDPIR program want in your regular food package from FNS? Choose all that apply.

Frozen Ground Bison, Salmon, Wild Rice

Q3: USDA has an approved vendor to supply frozen ground bison. How much bison would you need as part of USDA deliveries? Please specify your average take rate in cases (40-1 lb packages).

60



Q4: When USDA has approved the vendors for the other products listed above, what would your average monthly take rate be?

Salmon (in cases of 40 units)

20

Wild Rice (in cases of 40 units)

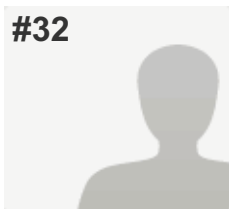
60

Q5: Would you like all the Native food items mentioned (bison, salmon, blue cornmeal, wild rice) to be delivered on a year-round basis?

Yes

Traditional Foods Survey 1

#32



COMPLETE

Collector: Web Link 1 (Web Link)

Started: Thursday, June 26, 2014 8:27:12 AM

Last Modified: Thursday, June 26, 2014 8:30:07 AM

Time Spent: 00:02:55

IP Address: 64.33.161.229

PAGE 1

Q1: What region do you represent?

Midwest Region

Q2: Which of the following Native foods would your FDPIR program want in your regular food package from FNS? Choose all that apply.

Wild Rice

Q3: USDA has an approved vendor to supply frozen ground bison. How much bison would you need as part of USDA deliveries? Please specify your average take rate in cases (40-1 lb packages).

about 4 cases

Q4: When USDA has approved the vendors for the other products listed above, what would your average monthly take rate be?

Salmon (in cases of 40 units)

1

Blue Cornmeal (in cases of 40 units)

1

Wild Rice (in cases of 40 units)

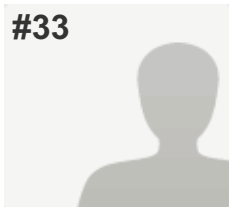
5 or more

Q5: Would you like all the Native food items mentioned (bison, salmon, blue cornmeal, wild rice) to be delivered on a year-round basis?

Yes

Traditional Foods Survey 1

#33



COMPLETE

Collector: Web Link 1 (Web Link)

Started: Thursday, June 26, 2014 8:08:56 AM

Last Modified: Thursday, June 26, 2014 8:40:59 AM

Time Spent: 00:32:03

IP Address: 207.109.247.51

PAGE 1

Q1: What region do you represent?

Western Region

Q2: Which of the following Native foods would your FDPIR program want in your regular food package from FNS? Choose all that apply.

Frozen Ground Bison, Wild Rice,
Other (please specify) berries

Q3: USDA has an approved vendor to supply frozen ground bison. How much bison would you need as part of USDA deliveries? Please specify your average take rate in cases (40-1 lb packages).

20-40 cases a month



Q4: When USDA has approved the vendors for the other products listed above, what would your average monthly take rate be?

Wild Rice (in cases of 40 units)

6 cases a month at least

Other (Please specify)

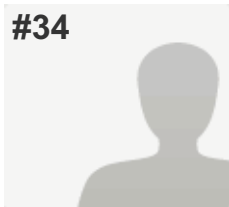
berries 8 cases a month

Q5: Would you like all the Native food items mentioned (bison, salmon, blue cornmeal, wild rice) to be delivered on a year-round basis?

Yes

Traditional Foods Survey 1

#34



COMPLETE

Collector: Web Link 1 (Web Link)

Started: Thursday, June 26, 2014 8:49:47 AM

Last Modified: Thursday, June 26, 2014 8:54:58 AM

Time Spent: 00:05:11

IP Address: 50.50.0.50

PAGE 1

Q1: What region do you represent?

Midwest Region

Q2: Which of the following Native foods would your FDPIR program want in your regular food package from FNS? Choose all that apply.

Frozen Ground Bison, Salmon, Wild Rice

Q3: USDA has an approved vendor to supply frozen ground bison. How much bison would you need as part of USDA deliveries? Please specify your average take rate in cases (40-1 lb packages).

10 cases per month(to start with)

Q4: When USDA has approved the vendors for the other products listed above, what would your average monthly take rate be?

Salmon (in cases of 40 units)

2 - 3 cases a month

Wild Rice (in cases of 40 units)

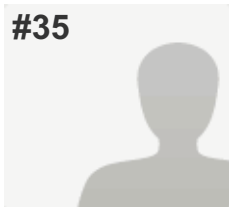
20 cases per month (to startwith)

Q5: Would you like all the Native food items mentioned (bison, salmon, blue cornmeal, wild rice) to be delivered on a year-round basis?

Yes

Traditional Foods Survey 1

#35



COMPLETE

Collector: Web Link 1 (Web Link)

Started: Thursday, June 26, 2014 8:58:51 AM

Last Modified: Thursday, June 26, 2014 9:08:17 AM

Time Spent: 00:09:26

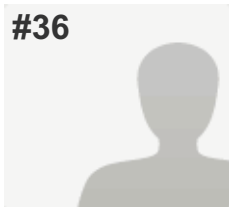
IP Address: 184.9.99.230

PAGE 1

Q1: What region do you represent?	Midwest Region
Q2: Which of the following Native foods would your FDPIR program want in your regular food package from FNS? Choose all that apply.	Frozen Ground Bison, Wild Rice, Other (please specify) fish- walleyes, bluegills,sunfish,crappies,
Q3: USDA has an approved vendor to supply frozen ground bison. How much bison would you need as part of USDA deliveries? Please specify your average take rate in cases (40-1 lb packages).	4cases a month
<div>◀</div> <div></div> <div>▶</div>	
Q4: When USDA has approved the vendors for the other products listed above, what would your average monthly take rate be?	
Wild Rice (in cases of 40 units)	4cases, wildrice should be parched over wood not propane or gas
Other (Please specify)	3 cases, fns should let us buy from tribal members and native american
Q5: Would you like all the Native food items mentioned (bison, salmon, blue cornmeal, wild rice) to be delivered on a year-round basis?	Yes

Traditional Foods Survey 1

#36



COMPLETE

Collector: Web Link 1 (Web Link)

Started: Thursday, June 26, 2014 9:59:58 AM

Last Modified: Thursday, June 26, 2014 10:20:08 AM

Time Spent: 00:20:10

IP Address: 74.41.142.198

PAGE 1

Q1: What region do you represent?

Midwest Region

Q2: Which of the following Native foods would your FDPIR program want in your regular food package from FNS? Choose all that apply.

Frozen Ground Bison, Salmon, Wild Rice,
Other (please specify) frozen berries

Q3: USDA has an approved vendor to supply frozen ground bison. How much bison would you need as part of USDA deliveries? Please specify your average take rate in cases (40-1 lb packages).

2

Q4: When USDA has approved the vendors for the other products listed above, what would your average monthly take rate be?

Salmon (in cases of 40 units)

2

Wild Rice (in cases of 40 units)

2

Other (Please specify)

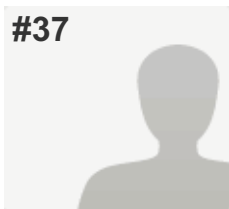
3

Q5: Would you like all the Native food items mentioned (bison, salmon, blue cornmeal, wild rice) to be delivered on a year-round basis?

Yes

Traditional Foods Survey 1

#37



COMPLETE

Collector: Web Link 1 (Web Link)

Started: Thursday, June 26, 2014 10:30:53 AM

Last Modified: Thursday, June 26, 2014 10:32:36 AM

Time Spent: 00:01:43

IP Address: 184.20.74.223

PAGE 1

Q1: What region do you represent?

Western Region

Q2: Which of the following Native foods would your FDPIR program want in your regular food package from FNS? Choose all that apply.

Frozen Ground Bison, Salmon

Q3: USDA has an approved vendor to supply frozen ground bison. How much bison would you need as part of USDA deliveries? Please specify your average take rate in cases (40-1 lb packages).

1 case

Q4: When USDA has approved the vendors for the other products listed above, what would your average monthly take rate be?

Salmon (in cases of 40 units)

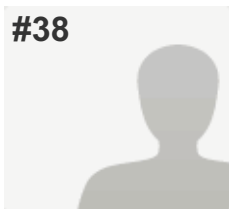
1 case

Q5: Would you like all the Native food items mentioned (bison, salmon, blue cornmeal, wild rice) to be delivered on a year-round basis?

Yes

Traditional Foods Survey 1

#38



COMPLETE

Collector: Web Link 1 (Web Link)

Started: Thursday, June 26, 2014 10:04:40 AM

Last Modified: Thursday, June 26, 2014 10:36:39 AM

Time Spent: 00:31:59

IP Address: 64.251.165.147

PAGE 1

Q1: What region do you represent?

Mountain Plains Region

Q2: Which of the following Native foods would your FDPIR program want in your regular food package from FNS? Choose all that apply.

Frozen Ground Bison

Q3: USDA has an approved vendor to supply frozen ground bison. How much bison would you need as part of USDA deliveries? Please specify your average take rate in cases (40-1 lb packages).

75 cs per month

Q4: When USDA has approved the vendors for the other products listed above, what would your average monthly take rate be?

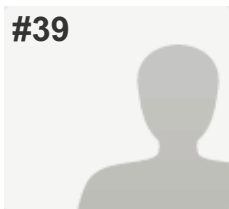
Salmon (in cases of 40 units)	160
Blue Cornmeal (in cases of 40 units)	120
Wild Rice (in cases of 40 units)	400

Q5: Would you like all the Native food items mentioned (bison, salmon, blue cornmeal, wild rice) to be delivered on a year-round basis?

Yes

Traditional Foods Survey 1

#39



COMPLETE

Collector: Web Link 1 (Web Link)

Started: Thursday, June 26, 2014 10:40:19 AM

Last Modified: Thursday, June 26, 2014 10:44:14 AM

Time Spent: 00:03:55

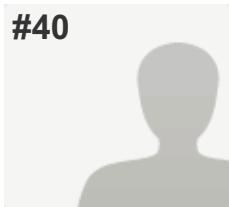
IP Address: 68.188.213.70

PAGE 1

Q1: What region do you represent?	Midwest Region
Q2: Which of the following Native foods would your FDPIR program want in your regular food package from FNS? Choose all that apply.	Frozen Ground Bison, Wild Rice, Other (please specify) Strawberries, blueberries
Q3: USDA has an approved vendor to supply frozen ground bison. How much bison would you need as part of USDA deliveries? Please specify your average take rate in cases (40-1 lb packages).	15 cases per month
<div> <div>◀</div> <div></div> <div>▶</div> </div>	
Q4: When USDA has approved the vendors for the other products listed above, what would your average monthly take rate be?	
Salmon (in cases of 40 units)	5
Wild Rice (in cases of 40 units)	4
Q5: Would you like all the Native food items mentioned (bison, salmon, blue cornmeal, wild rice) to be delivered on a year-round basis?	No

Traditional Foods Survey 1

#40



COMPLETE

Collector: Web Link 1 (Web Link)

Started: Thursday, June 26, 2014 10:48:44 AM

Last Modified: Thursday, June 26, 2014 10:51:13 AM

Time Spent: 00:02:29

IP Address: 69.69.207.10

PAGE 1

Q1: What region do you represent?

Mountain Plains Region

Q2: Which of the following Native foods would your FDPIR program want in your regular food package from FNS? Choose all that apply.

Salmon, Blue Cornmeal, Wild Rice

Q3: USDA has an approved vendor to supply frozen ground bison. How much bison would you need as part of USDA deliveries? Please specify your average take rate in cases (40-1 lb packages).

100-1 lb. packages

Q4: When USDA has approved the vendors for the other products listed above, what would your average monthly take rate be?

Salmon (in cases of 40 units)

if canned not too many If Frozen would probly go better

Blue Cornmeal (in cases of 40 units)

They would love to try....

Wild Rice (in cases of 40 units)

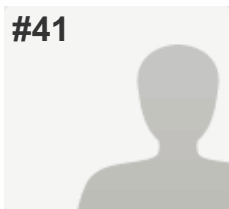
all would be gone

Q5: Would you like all the Native food items mentioned (bison, salmon, blue cornmeal, wild rice) to be delivered on a year-round basis?

Yes

Traditional Foods Survey 1

#41



COMPLETE

Collector: Web Link 1 (Web Link)

Started: Thursday, June 26, 2014 10:45:22 AM

Last Modified: Thursday, June 26, 2014 10:52:57 AM

Time Spent: 00:07:35

IP Address: 69.69.207.10

PAGE 1

Q1: What region do you represent?

Mountain Plains Region

Q2: Which of the following Native foods would your FDPIR program want in your regular food package from FNS? Choose all that apply.

Frozen Ground Bison, Wild Rice

Q3: USDA has an approved vendor to supply frozen ground bison. How much bison would you need as part of USDA deliveries? Please specify your average take rate in cases (40-1 lb packages).

About 40 cases per month.

Q4: When USDA has approved the vendors for the other products listed above, what would your average monthly take rate be?

Salmon (in cases of 40 units)

Less than 1 case per month (WE WOULD RATHER HAVE FRZN PORK CHOPS).

Blue Cornmeal (in cases of 40 units)

Less than 10 cases per month

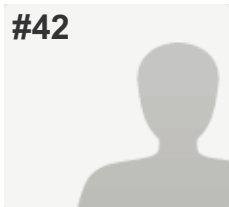
Wild Rice (in cases of 40 units)

About 20 cases per month, depending on pack size.

Q5: Would you like all the Native food items mentioned (bison, salmon, blue cornmeal, wild rice) to be delivered on a year-round basis?

Yes

#42

**COMPLETE****Collector:** Web Link 1 (Web Link)**Started:** Thursday, June 26, 2014 1:56:09 PM**Last Modified:** Thursday, June 26, 2014 1:57:50 PM**Time Spent:** 00:01:41**IP Address:** 68.117.120.86

PAGE 1

Q1: What region do you represent?

Midwest Region

Q2: Which of the following Native foods would your FDPIR program want in your regular food package from FNS? Choose all that apply.

Wild Rice

Q3: USDA has an approved vendor to supply frozen ground bison. How much bison would you need as part of USDA deliveries? Please specify your average take rate in cases (40-1 lb packages).

20 cases

**Q4: When USDA has approved the vendors for the other products listed above, what would your average monthly take rate be?**

Salmon (in cases of 40 units)

1 case

Blue Cornmeal (in cases of 40 units)

0 case

Wild Rice (in cases of 40 units)

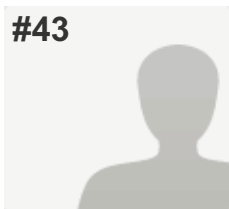
4 cases

Q5: Would you like all the Native food items mentioned (bison, salmon, blue cornmeal, wild rice) to be delivered on a year-round basis?

Yes

Traditional Foods Survey 1

#43



COMPLETE

Collector: Web Link 1 (Web Link)

Started: Friday, June 27, 2014 8:29:18 AM

Last Modified: Friday, June 27, 2014 8:31:46 AM

Time Spent: 00:02:28

IP Address: 68.235.89.136

PAGE 1

Q1: What region do you represent?

Midwest Region

Q2: Which of the following Native foods would your FDPIR program want in your regular food package from FNS? Choose all that apply.

Wild Rice

Q3: USDA has an approved vendor to supply frozen ground bison. How much bison would you need as part of USDA deliveries? Please specify your average take rate in cases (40-1 lb packages).

3 CASES

Q4: When USDA has approved the vendors for the other products listed above, what would your average monthly take rate be?

Wild Rice (in cases of 40 units)

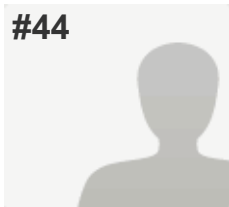
20 CASES

Q5: Would you like all the Native food items mentioned (bison, salmon, blue cornmeal, wild rice) to be delivered on a year-round basis?

Yes

Traditional Foods Survey 1

#44



COMPLETE

Collector: Web Link 1 (Web Link)

Started: Friday, June 27, 2014 10:13:25 AM

Last Modified: Friday, June 27, 2014 10:16:39 AM

Time Spent: 00:03:14

IP Address: 64.16.57.7

PAGE 1

Q1: What region do you represent?

Western Region

Q2: Which of the following Native foods would your FDPIR program want in your regular food package from FNS? Choose all that apply.

Other (please specify) Tepary beans

Q3: USDA has an approved vendor to supply frozen ground bison. How much bison would you need as part of USDA deliveries? Please specify your average take rate in cases (40-1 lb packages).

0

Q4: When USDA has approved the vendors for the other products listed above, what would your average monthly take rate be?

Salmon (in cases of 40 units)

0

Blue Cornmeal (in cases of 40 units)

1

Wild Rice (in cases of 40 units)

0

Other (Please specify)

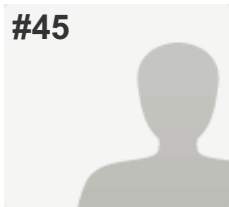
tepary beans- 20 cases month

Q5: Would you like all the Native food items mentioned (bison, salmon, blue cornmeal, wild rice) to be delivered on a year-round basis?

No

Traditional Foods Survey 1

#45



COMPLETE

Collector: Web Link 1 (Web Link)

Started: Friday, June 27, 2014 10:31:24 AM

Last Modified: Friday, June 27, 2014 10:34:35 AM

Time Spent: 00:03:11

IP Address: 206.51.113.96

PAGE 1

Q1: What region do you represent?

Midwest Region

Q2: Which of the following Native foods would your FDPIR program want in your regular food package from FNS? Choose all that apply.

Frozen Ground Bison, Wild Rice

Q3: USDA has an approved vendor to supply frozen ground bison. How much bison would you need as part of USDA deliveries? Please specify your average take rate in cases (40-1 lb packages).

7 per month at 1 lb per person.

Q4: When USDA has approved the vendors for the other products listed above, what would your average monthly take rate be?

Wild Rice (in cases of 40 units)

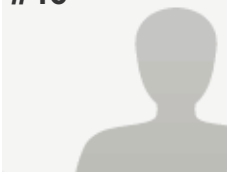
10 cases

Q5: Would you like all the Native food items mentioned (bison, salmon, blue cornmeal, wild rice) to be delivered on a year-round basis?

Yes

Traditional Foods Survey 1

#46



COMPLETE

Collector: Web Link 1 (Web Link)

Started: Friday, June 27, 2014 2:32:30 PM

Last Modified: Friday, June 27, 2014 2:48:35 PM

Time Spent: 00:16:05

IP Address: 98.16.202.86

PAGE 1

Q1: What region do you represent?

Southwest Region

Q2: Which of the following Native foods would your FDPIR program want in your regular food package from FNS? Choose all that apply.

Frozen Ground Bison, Wild Rice,
Other (please specify) Dried Flint or Sweet Corn

Q3: USDA has an approved vendor to supply frozen ground bison. How much bison would you need as part of USDA deliveries? Please specify your average take rate in cases (40-1 lb packages).

120 cases per month

Q4: When USDA has approved the vendors for the other products listed above, what would your average monthly take rate be?

Wild Rice (in cases of 40 units)

30 cases per month (2 lbs bags)

Other (Please specify)

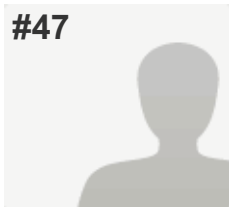
Flint or Sweet Corn: 2000 units per month (1 lbs units)

Q5: Would you like all the Native food items mentioned (bison, salmon, blue cornmeal, wild rice) to be delivered on a year-round basis?

Yes

Traditional Foods Survey 1

#47



COMPLETE

Collector: Web Link 1 (Web Link)

Started: Monday, June 30, 2014 8:05:52 AM

Last Modified: Monday, June 30, 2014 8:07:43 AM

Time Spent: 00:01:51

IP Address: 8.20.25.237

PAGE 1

Q1: What region do you represent?

Mountain Plains Region

Q2: Which of the following Native foods would your FDPIR program want in your regular food package from FNS? Choose all that apply.

Frozen Ground Bison, Salmon, Blue Cornmeal, Wild Rice

Q3: USDA has an approved vendor to supply frozen ground bison. How much bison would you need as part of USDA deliveries? Please specify your average take rate in cases (40-1 lb packages).

at least 8-10 cases per month

Q4: When USDA has approved the vendors for the other products listed above, what would your average monthly take rate be?

Salmon (in cases of 40 units)

3-4

Blue Cornmeal (in cases of 40 units)

5

Wild Rice (in cases of 40 units)

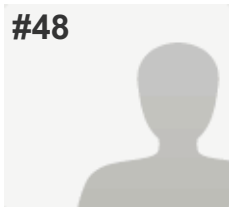
2

Q5: Would you like all the Native food items mentioned (bison, salmon, blue cornmeal, wild rice) to be delivered on a year-round basis?

Yes

Traditional Foods Survey 1

#48



COMPLETE

Collector: Web Link 1 (Web Link)

Started: Monday, June 30, 2014 1:07:49 PM

Last Modified: Monday, June 30, 2014 1:12:16 PM

Time Spent: 00:04:27

IP Address: 104.12.92.41

PAGE 1

Q1: What region do you represent?

Southwest Region

Q2: Which of the following Native foods would your FDPIR program want in your regular food package from FNS? Choose all that apply.

Frozen Ground Bison, Wild Rice,
Other (please specify) Beef Kidneys

Q3: USDA has an approved vendor to supply frozen ground bison. How much bison would you need as part of USDA deliveries? Please specify your average take rate in cases (40-1 lb packages).

10

Q4: When USDA has approved the vendors for the other products listed above, what would your average monthly take rate be?

Salmon (in cases of 40 units)

2 cases = 80 cans

Blue Cornmeal (in cases of 40 units)

2 cases - 80 bags

Wild Rice (in cases of 40 units)

5 cases = 200 lbs

Other (Please specify)

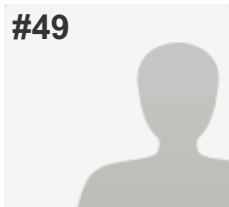
Kidneys 10 cases = 120 units

Q5: Would you like all the Native food items mentioned (bison, salmon, blue cornmeal, wild rice) to be delivered on a year-round basis?

Yes

Traditional Foods Survey 1

#49



COMPLETE

Collector: Web Link 1 (Web Link)

Started: Tuesday, July 01, 2014 6:24:57 AM

Last Modified: Tuesday, July 01, 2014 6:28:16 AM

Time Spent: 00:03:19

IP Address: 216.187.158.82

PAGE 1

Q1: What region do you represent?

Mountain Plains Region

Q2: Which of the following Native foods would your FDPIR program want in your regular food package from FNS? Choose all that apply.

Frozen Ground Bison, Salmon, Wild Rice

Q3: USDA has an approved vendor to supply frozen ground bison. How much bison would you need as part of USDA deliveries? Please specify your average take rate in cases (40-1 lb packages).

3 per month

Q4: When USDA has approved the vendors for the other products listed above, what would your average monthly take rate be?

Salmon (in cases of 40 units)

1 per month

Blue Cornmeal (in cases of 40 units)

?

Wild Rice (in cases of 40 units)

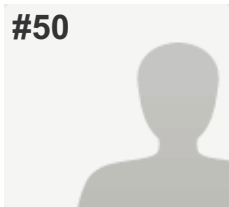
3 per month

Q5: Would you like all the Native food items mentioned (bison, salmon, blue cornmeal, wild rice) to be delivered on a year-round basis?

Yes

Traditional Foods Survey 1

#50



COMPLETE

Collector: Web Link 1 (Web Link)

Started: Tuesday, July 01, 2014 7:45:27 AM

Last Modified: Tuesday, July 01, 2014 8:07:26 AM

Time Spent: 00:21:59

IP Address: 12.238.224.66

PAGE 1

Q1: What region do you represent?

Southwest Region

Q2: Which of the following Native foods would your FDPIR program want in your regular food package from FNS? Choose all that apply.

Frozen Ground Bison, Wild Rice,
Other (please specify) Sofke meal

Q3: USDA has an approved vendor to supply frozen ground bison. How much bison would you need as part of USDA deliveries? Please specify your average take rate in cases (40-1 lb packages).

125 cases



Q4: When USDA has approved the vendors for the other products listed above, what would your average monthly take rate be?

Blue Cornmeal (in cases of 40 units)

22 cases

Wild Rice (in cases of 40 units)

35 cases

Other (Please specify)

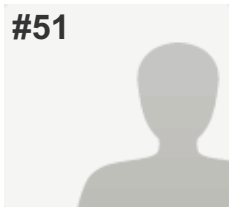
A lot of sofke

Q5: Would you like all the Native food items mentioned (bison, salmon, blue cornmeal, wild rice) to be delivered on a year-round basis?

No

Traditional Foods Survey 1

#51



COMPLETE

Collector: Web Link 1 (Web Link)

Started: Wednesday, July 02, 2014 9:03:40 AM

Last Modified: Wednesday, July 02, 2014 9:05:31 AM

Time Spent: 00:01:51

IP Address: 206.40.119.129

PAGE 1

Q1: What region do you represent?

Midwest Region

Q2: Which of the following Native foods would your FDPIR program want in your regular food package from FNS? Choose all that apply.

Frozen Ground Bison, Wild Rice

Q3: USDA has an approved vendor to supply frozen ground bison. How much bison would you need as part of USDA deliveries? Please specify your average take rate in cases (40-1 lb packages).

10 cases

Q4: When USDA has approved the vendors for the other products listed above, what would your average monthly take rate be?

Wild Rice (in cases of 40 units)

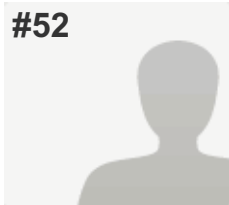
10 cases

Q5: Would you like all the Native food items mentioned (bison, salmon, blue cornmeal, wild rice) to be delivered on a year-round basis?

Yes

Traditional Foods Survey 1

#52



COMPLETE

Collector: Web Link 1 (Web Link)

Started: Wednesday, July 02, 2014 2:25:41 PM

Last Modified: Wednesday, July 02, 2014 2:30:26 PM

Time Spent: 00:04:45

IP Address: 64.186.114.254

PAGE 1

Q1: What region do you represent?

Western Region

Q2: Which of the following Native foods would your FDPIR program want in your regular food package from FNS? Choose all that apply.

Frozen Ground Bison, Salmon, Blue Cornmeal,
Wild Rice,
Other (please specify) canned shellfish/seafoods

Q3: USDA has an approved vendor to supply frozen ground bison. How much bison would you need as part of USDA deliveries? Please specify your average take rate in cases (40-1 lb packages).

2 cases per month if 2lbs = 1 unit

Q4: When USDA has approved the vendors for the other products listed above, what would your average monthly take rate be?

Salmon (in cases of 40 units)

1 case

Blue Cornmeal (in cases of 40 units)

1 case

Wild Rice (in cases of 40 units)

1 case

Other (Please specify)

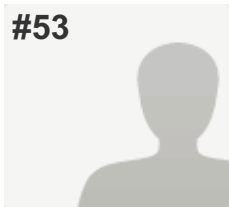
canned shellfish/seafoods 2 cases

Q5: Would you like all the Native food items mentioned (bison, salmon, blue cornmeal, wild rice) to be delivered on a year-round basis?

Yes

Traditional Foods Survey 1

#53



COMPLETE

Collector: Web Link 1 (Web Link)

Started: Monday, July 07, 2014 11:12:49 AM

Last Modified: Monday, July 07, 2014 11:18:15 AM

Time Spent: 00:05:26

IP Address: 199.59.217.11

PAGE 1

Q1: What region do you represent?

Western Region

Q2: Which of the following Native foods would your FDPIR program want in your regular food package from FNS? Choose all that apply.

Frozen Ground Bison, Salmon, Blue Cornmeal,
Wild Rice,
Other (please specify) Clams

Q3: USDA has an approved vendor to supply frozen ground bison. How much bison would you need as part of USDA deliveries? Please specify your average take rate in cases (40-1 lb packages).

difficult to project without consistent previous data

Q4: When USDA has approved the vendors for the other products listed above, what would your average monthly take rate be?

Salmon (in cases of 40 units)

difficult to project without consistent previous data

Blue Cornmeal (in cases of 40 units)

difficult to project without consistent previous data

Wild Rice (in cases of 40 units)

difficult to project without consistent previous data

Other (Please specify)

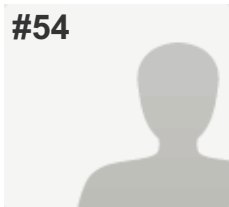
difficult to project without consistent previous data

Q5: Would you like all the Native food items mentioned (bison, salmon, blue cornmeal, wild rice) to be delivered on a year-round basis?

Yes

Traditional Foods Survey 1

#54



COMPLETE

Collector: Web Link 1 (Web Link)

Started: Tuesday, July 08, 2014 9:51:51 AM

Last Modified: Tuesday, July 08, 2014 9:53:00 AM

Time Spent: 00:01:09

IP Address: 76.7.1.135

PAGE 1

Q1: What region do you represent?

Mountain Plains Region

Q2: Which of the following Native foods would your FDPIR program want in your regular food package from FNS? Choose all that apply.

Frozen Ground Bison

Q3: USDA has an approved vendor to supply frozen ground bison. How much bison would you need as part of USDA deliveries? Please specify your average take rate in cases (40-1 lb packages).

4 per month

Q4: When USDA has approved the vendors for the other products listed above, what would your average monthly take rate be?

Salmon (in cases of 40 units)

1

Blue Cornmeal (in cases of 40 units)

1

Wild Rice (in cases of 40 units)

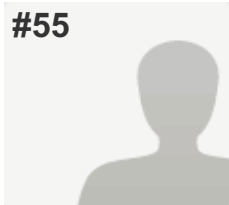
1

Q5: Would you like all the Native food items mentioned (bison, salmon, blue cornmeal, wild rice) to be delivered on a year-round basis?

Yes

Traditional Foods Survey 1

#55



COMPLETE

Collector: Web Link 1 (Web Link)

Started: Thursday, July 17, 2014 10:37:23 AM

Last Modified: Thursday, July 17, 2014 10:43:27 AM

Time Spent: 00:06:04

IP Address: 74.41.157.8

PAGE 1

Q1: What region do you represent?

Western Region

Q2: Which of the following Native foods would your FDPIR program want in your regular food package from FNS? Choose all that apply.

Frozen Ground Bison, Wild Rice

Q3: USDA has an approved vendor to supply frozen ground bison. How much bison would you need as part of USDA deliveries? Please specify your average take rate in cases (40-1 lb packages).

20 cases

Q4: When USDA has approved the vendors for the other products listed above, what would your average monthly take rate be?

Salmon (in cases of 40 units)

none

Blue Cornmeal (in cases of 40 units)

none

Wild Rice (in cases of 40 units)

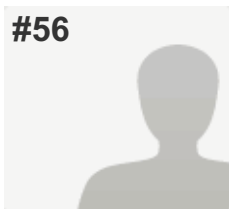
5 case

Q5: Would you like all the Native food items mentioned (bison, salmon, blue cornmeal, wild rice) to be delivered on a year-round basis?

Yes

Traditional Foods Survey 1

#56



COMPLETE

Collector: Web Link 1 (Web Link)

Started: Thursday, July 17, 2014 1:08:29 PM

Last Modified: Thursday, July 17, 2014 1:10:18 PM

Time Spent: 00:01:49

IP Address: 172.129.16.3

PAGE 1

Q1: What region do you represent?

Western Region

Q2: Which of the following Native foods would your FDPIR program want in your regular food package from FNS? Choose all that apply.

Frozen Ground Bison

Q3: USDA has an approved vendor to supply frozen ground bison. How much bison would you need as part of USDA deliveries? Please specify your average take rate in cases (40-1 lb packages).

5-7 cases a month

Q4: When USDA has approved the vendors for the other products listed above, what would your average monthly take rate be?

Salmon (in cases of 40 units)

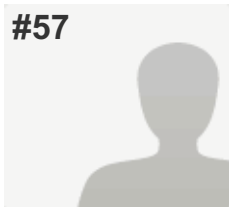
2 cases a month

Q5: Would you like all the Native food items mentioned (bison, salmon, blue cornmeal, wild rice) to be delivered on a year-round basis?

No

Traditional Foods Survey 1

#57



COMPLETE

Collector: Web Link 1 (Web Link)

Started: Thursday, July 17, 2014 3:40:05 PM

Last Modified: Thursday, July 17, 2014 3:43:49 PM

Time Spent: 00:03:44

IP Address: 64.16.57.7

PAGE 1

Q1: What region do you represent?

Western Region

Q2: Which of the following Native foods would your FDPIR program want in your regular food package from FNS? Choose all that apply.

Other (please specify) Elk, Deer

Q3: USDA has an approved vendor to supply frozen ground bison. How much bison would you need as part of USDA deliveries? Please specify your average take rate in cases (40-1 lb packages).

Zero its not a traditional food in my area



Q4: When USDA has approved the vendors for the other products listed above, what would your average monthly take rate be?

Other (Please specify)

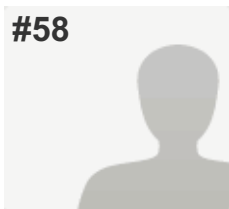
hard to say, Canned salmon is a slow mover now in my area

Q5: Would you like all the Native food items mentioned (bison, salmon, blue cornmeal, wild rice) to be delivered on a year-round basis?

No

Traditional Foods Survey 1

#58



COMPLETE

Collector: Web Link 1 (Web Link)

Started: Monday, July 21, 2014 2:01:54 PM

Last Modified: Monday, July 21, 2014 2:07:33 PM

Time Spent: 00:05:39

IP Address: 63.237.235.254

PAGE 1

Q1: What region do you represent?

Western Region

Q2: Which of the following Native foods would your FDPIR program want in your regular food package from FNS? Choose all that apply.

Frozen Ground Bison, Wild Rice

Q3: USDA has an approved vendor to supply frozen ground bison. How much bison would you need as part of USDA deliveries? Please specify your average take rate in cases (40-1 lb packages).

10 cases to begin

Q4: When USDA has approved the vendors for the other products listed above, what would your average monthly take rate be?

Wild Rice (in cases of 40 units)

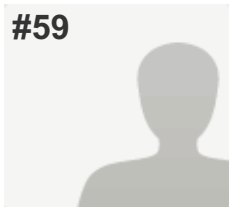
20 cases

Q5: Would you like all the Native food items mentioned (bison, salmon, blue cornmeal, wild rice) to be delivered on a year-round basis?

Yes

Traditional Foods Survey 1

#59



COMPLETE

Collector: Web Link 1 (Web Link)

Started: Tuesday, July 22, 2014 1:11:56 PM

Last Modified: Tuesday, July 22, 2014 1:14:38 PM

Time Spent: 00:02:42

IP Address: 74.43.74.155

PAGE 1

Q1: What region do you represent?

Western Region

Q2: Which of the following Native foods would your FDPIR program want in your regular food package from FNS? Choose all that apply.

Frozen Ground Bison, Blue Cornmeal, Wild Rice

Q3: USDA has an approved vendor to supply frozen ground bison. How much bison would you need as part of USDA deliveries? Please specify your average take rate in cases (40-1 lb packages).

1-5 cases

Q4: When USDA has approved the vendors for the other products listed above, what would your average monthly take rate be?

Salmon (in cases of 40 units)

0 -- would not order this item

Blue Cornmeal (in cases of 40 units)

would order 30-40 cases

Wild Rice (in cases of 40 units)

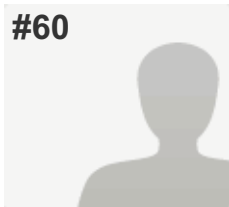
would order slowly 20-30 cases see how it goes

Q5: Would you like all the Native food items mentioned (bison, salmon, blue cornmeal, wild rice) to be delivered on a year-round basis?

Yes

Traditional Foods Survey 1

#60



COMPLETE

Collector: Web Link 1 (Web Link)

Started: Tuesday, July 22, 2014 1:54:53 PM

Last Modified: Tuesday, July 22, 2014 1:58:07 PM

Time Spent: 00:03:14

IP Address: 74.43.72.152

PAGE 1

Q1: What region do you represent?

Western Region

Q2: Which of the following Native foods would your FDPIR program want in your regular food package from FNS? Choose all that apply.

Blue Cornmeal, Wild Rice,
Other (please specify) Blue Flour

Q3: USDA has an approved vendor to supply frozen ground bison. How much bison would you need as part of USDA deliveries? Please specify your average take rate in cases (40-1 lb packages).

n/a

Q4: When USDA has approved the vendors for the other products listed above, what would your average monthly take rate be?

Blue Cornmeal (in cases of 40 units)

50 cs.

Wild Rice (in cases of 40 units)

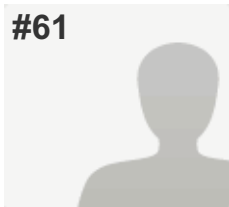
50 cs.

Q5: Would you like all the Native food items mentioned (bison, salmon, blue cornmeal, wild rice) to be delivered on a year-round basis?

No

Traditional Foods Survey 1

#61



COMPLETE

Collector: Web Link 1 (Web Link)

Started: Tuesday, July 22, 2014 3:23:42 PM

Last Modified: Tuesday, July 22, 2014 4:15:04 PM

Time Spent: 00:51:22

IP Address: 74.42.211.24

PAGE 1

Q1: What region do you represent?

Western Region

Q2: Which of the following Native foods would your FDPIR program want in your regular food package from FNS? Choose all that apply.

Blue Cornmeal

Q3: USDA has an approved vendor to supply frozen ground bison. How much bison would you need as part of USDA deliveries? Please specify your average take rate in cases (40-1 lb packages).

maybe 10 cases (trial run)

Q4: When USDA has approved the vendors for the other products listed above, what would your average monthly take rate be?

Salmon (in cases of 40 units)

10- 15 cases

Blue Cornmeal (in cases of 40 units)

60 cases

Wild Rice (in cases of 40 units)

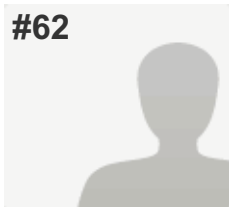
10 cases

Q5: Would you like all the Native food items mentioned (bison, salmon, blue cornmeal, wild rice) to be delivered on a year-round basis?

Yes

Traditional Foods Survey 1

#62



COMPLETE

Collector: Web Link 1 (Web Link)

Started: Wednesday, July 23, 2014 7:21:13 AM

Last Modified: Wednesday, July 23, 2014 7:24:21 AM

Time Spent: 00:03:08

IP Address: 184.10.128.56

PAGE 1

Q1: What region do you represent?

Western Region

Q2: Which of the following Native foods would your FDPIR program want in your regular food package from FNS? Choose all that apply.

Blue Cornmeal

Q3: USDA has an approved vendor to supply frozen ground bison. How much bison would you need as part of USDA deliveries? Please specify your average take rate in cases (40-1 lb packages).

10 cases



Q4: When USDA has approved the vendors for the other products listed above, what would your average monthly take rate be?

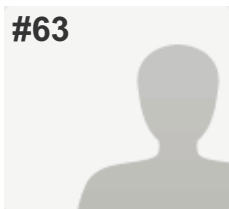
Blue Cornmeal (in cases of 40 units)

60 cases a month

Q5: Would you like all the Native food items mentioned (bison, salmon, blue cornmeal, wild rice) to be delivered on a year-round basis?

Yes

#63



COMPLETE

Collector: Web Link 1 (Web Link)

Started: Thursday, July 24, 2014 7:06:20 AM

Last Modified: Thursday, July 24, 2014 7:11:46 AM

Time Spent: 00:05:26

IP Address: 98.16.202.90

PAGE 1

Q1: What region do you represent?

Southwest Region

Q2: Which of the following Native foods would your FDPIR program want in your regular food package from FNS? Choose all that apply.

Frozen Ground Bison, Salmon, Blue Cornmeal,
Wild Rice,
Other (please specify)
pork, native dried corn, fresh pumpkin, yeast

Q3: USDA has an approved vendor to supply frozen ground bison. How much bison would you need as part of USDA deliveries? Please specify your average take rate in cases (40-1 lb packages).

if it came today 64 cases, if it comes in a year 72 cases

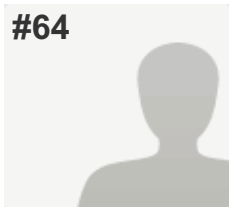
Q4: When USDA has approved the vendors for the other products listed above, what would your average monthly take rate be?

Salmon (in cases of 40 units)	36
Blue Cornmeal (in cases of 40 units)	48
Wild Rice (in cases of 40 units)	48
Other (Please specify)	48 pork, 48 dried corn, 24 fresh pumpkin, 24 yeast

Q5: Would you like all the Native food items mentioned (bison, salmon, blue cornmeal, wild rice) to be delivered on a year-round basis?

Yes

#64



COMPLETE

Collector: Web Link 1 (Web Link)

Started: Monday, July 28, 2014 10:07:06 AM

Last Modified: Monday, July 28, 2014 10:12:41 AM

Time Spent: 00:05:35

IP Address: 74.37.242.6

PAGE 1

Q1: What region do you represent?

Western Region

Q2: Which of the following Native foods would your FDPIR program want in your regular food package from FNS? Choose all that apply.

Other (please specify) MUTTON

Q3: USDA has an approved vendor to supply frozen ground bison. How much bison would you need as part of USDA deliveries? Please specify your average take rate in cases (40-1 lb packages).

60



Q4: When USDA has approved the vendors for the other products listed above, what would your average monthly take rate be?

Salmon (in cases of 40 units)

30

Blue Cornmeal (in cases of 40 units)

0

Wild Rice (in cases of 40 units)

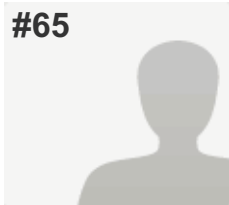
0

Q5: Would you like all the Native food items mentioned (bison, salmon, blue cornmeal, wild rice) to be delivered on a year-round basis?

Yes

Traditional Foods Survey 1

#65



COMPLETE

Collector: Web Link 1 (Web Link)

Started: Thursday, July 31, 2014 6:11:00 AM

Last Modified: Thursday, July 31, 2014 6:12:55 AM

Time Spent: 00:01:55

IP Address: 24.116.238.183

PAGE 1

Q1: What region do you represent?

Southwest Region

Q2: Which of the following Native foods would your FDPIR program want in your regular food package from FNS? Choose all that apply.

Wild Rice

Q3: USDA has an approved vendor to supply frozen ground bison. How much bison would you need as part of USDA deliveries? Please specify your average take rate in cases (40-1 lb packages).

25 cases -- 1 per hh member



Q4: When USDA has approved the vendors for the other products listed above, what would your average monthly take rate be?

Other (Please specify)

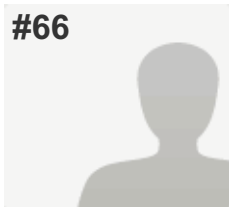
unknown

Q5: Would you like all the Native food items mentioned (bison, salmon, blue cornmeal, wild rice) to be delivered on a year-round basis?

No

Traditional Foods Survey 1

#66



COMPLETE

Collector: Web Link 1 (Web Link)

Started: Thursday, July 31, 2014 8:10:58 AM

Last Modified: Thursday, July 31, 2014 8:12:03 AM

Time Spent: 00:01:05

IP Address: 12.12.146.178

PAGE 1

Q1: What region do you represent?

Southwest Region

Q2: Which of the following Native foods would your FDPIR program want in your regular food package from FNS? Choose all that apply.

Frozen Ground Bison, Salmon, Wild Rice

Q3: USDA has an approved vendor to supply frozen ground bison. How much bison would you need as part of USDA deliveries? Please specify your average take rate in cases (40-1 lb packages).

20

Q4: When USDA has approved the vendors for the other products listed above, what would your average monthly take rate be?

Salmon (in cases of 40 units)

10

Blue Cornmeal (in cases of 40 units)

5

Wild Rice (in cases of 40 units)

5

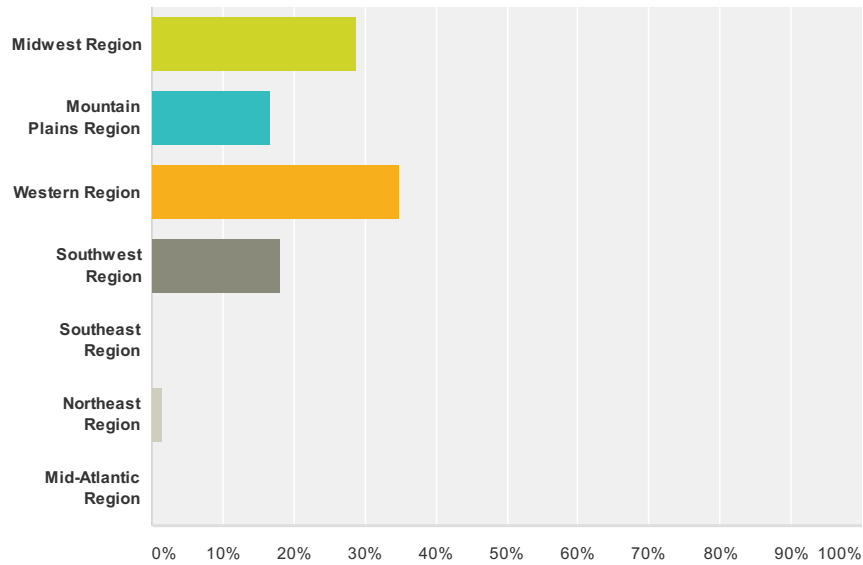
Q5: Would you like all the Native food items mentioned (bison, salmon, blue cornmeal, wild rice) to be delivered on a year-round basis?

Yes

Traditional Foods Survey 1

Q1 What region do you represent?

Answered: 66 Skipped: 0

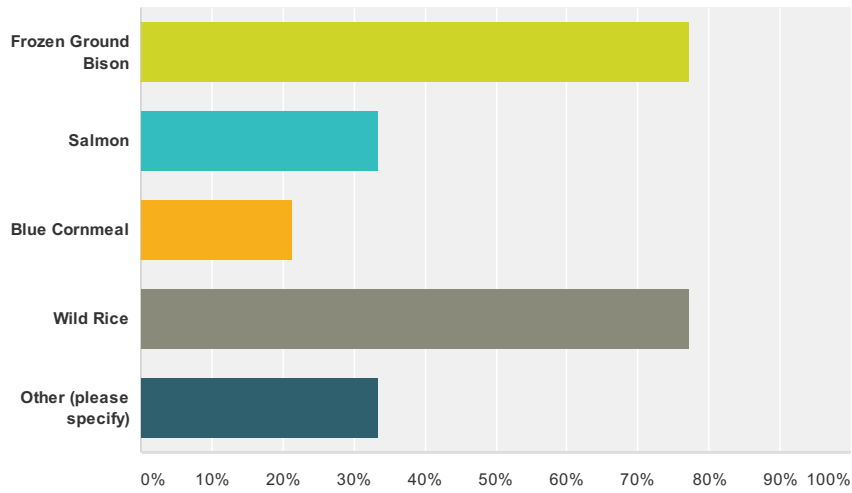


Answer Choices	Responses
Midwest Region	28.79%19
Mountain Plains Region	16.67%11
Western Region	34.85%23
Southwest Region	18.18%12
Southeast Region	0.00%0
Northeast Region	1.52%1
Mid-Atlantic Region	0.00%0
Total	66

Traditional Foods Survey 1

Q2 Which of the following Native foods would your FDPIR program want in your regular food package from FNS? Choose all that apply.

Answered: 66 Skipped: 0



Answer Choices	Responses
Frozen Ground Bison	77.27% 51
Salmon	33.33% 22
Blue Cornmeal	21.21% 14
Wild Rice	77.27% 51
Other (please specify)	33.33% 22
Total Respondents: 66	

#	Other (please specify)	Date
1	MUTTON	7/28/2014 12:13 PM
2	pork, native dried corn, fresh pumpkin, yeast	7/24/2014 9:12 AM
3	Blue Flour	7/22/2014 3:58 PM
4	Elk, Deer	7/17/2014 5:44 PM
5	Clams	7/7/2014 1:18 PM
6	canned shellfish/seafoods	7/2/2014 4:30 PM
7	Sofke meal	7/1/2014 10:07 AM
8	Beef Kidneys	6/30/2014 3:12 PM
9	Dried Flint or Sweet Corn	6/27/2014 4:49 PM
10	Tepary beans	6/27/2014 12:17 PM
11	Strawberries, blueberries	6/26/2014 12:44 PM
12	frozen berries	6/26/2014 12:20 PM
13	fish- walleyes, bluegills,sunfish,crappies,	6/26/2014 11:08 AM
14	berries	6/26/2014 10:41 AM
15	Pork Chops	6/25/2014 2:11 PM
16	Pork; Dried Sweet Corn	6/25/2014 11:36 AM
17	Give \$ to each region and let the region select their own	6/25/2014 10:59 AM
18	frozen salmon not canned	6/25/2014 10:45 AM
19	frozen salmon, not canned	6/25/2014 10:28 AM
20	Natural Wild Rice is the healthiest.	6/25/2014 10:11 AM
21	frozen Berries	6/25/2014 10:09 AM

Traditional Foods Survey 1

22	Salmon- not canned	6/25/2014 9:44 AM
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Traditional Foods Survey 1

Q3 USDA has an approved vendor to supply frozen ground bison. How much bison would you need as part of USDA deliveries? Please specify your average take rate in cases (40-1 lb packages).

Answered: 66 Skipped: 0

#	Responses	Date
1	20	7/31/2014 10:12 AM
2	25 cases -- 1 per hh member	7/31/2014 8:13 AM
3	60	7/28/2014 12:13 PM
4	if it came today 64 cases, if it comes in a year 72 cases	7/24/2014 9:12 AM
5	10 cases	7/23/2014 9:24 AM
6	maybe 10 cases (trial run)	7/22/2014 6:15 PM
7	n/a	7/22/2014 3:58 PM
8	1-5 cases	7/22/2014 3:15 PM
9	10 cases to begin	7/21/2014 4:08 PM
10	Zero its not a traditional food in my area	7/17/2014 5:44 PM
11	5-7 cases a month	7/17/2014 3:10 PM
12	20 cases	7/17/2014 12:43 PM
13	4 per month	7/8/2014 11:53 AM
14	difficult to project without consistent previous data	7/7/2014 1:18 PM
15	2 cases per month if 2lbs = 1 unit	7/2/2014 4:30 PM
16	10 cases	7/2/2014 11:06 AM
17	125 cases	7/1/2014 10:07 AM
18	3 per month	7/1/2014 8:28 AM
19	10	6/30/2014 3:12 PM
20	at least 8-10 cases per month	6/30/2014 10:08 AM
21	120 cases per month	6/27/2014 4:49 PM
22	7 per month at 1 lb per person.	6/27/2014 12:35 PM
23	0	6/27/2014 12:17 PM
24	3 CASES	6/27/2014 10:32 AM
25	20 cases	6/26/2014 3:58 PM
26	About 40 cases per month.	6/26/2014 12:53 PM
27	100-1 lb. packages	6/26/2014 12:51 PM
28	15 cases per month	6/26/2014 12:44 PM
29	75 cs per month	6/26/2014 12:37 PM
30	1 case	6/26/2014 12:33 PM
31	2	6/26/2014 12:20 PM

Traditional Foods Survey 1

32	4cases a month	6/26/2014 11:08 AM
33	10 cases per month(to start with)	6/26/2014 10:55 AM
34	20-40 cases a month	6/26/2014 10:41 AM
35	about 4 cases	6/26/2014 10:30 AM
36	60	6/26/2014 10:22 AM
37	10 for a 3 month inventory	6/26/2014 10:06 AM
38	50 cases/mo - depending on the guide rate	6/26/2014 10:02 AM
39	5	6/26/2014 7:11 AM
40	30	6/25/2014 5:46 PM
41	40	6/25/2014 4:49 PM
42	10	6/25/2014 4:26 PM
43	1 case	6/25/2014 4:23 PM
44	estimate 20-30 cases per month	6/25/2014 4:01 PM
45	40	6/25/2014 3:00 PM
46	3	6/25/2014 2:42 PM
47	160-320 Cases Per Month	6/25/2014 2:11 PM
48	30 cases a month	6/25/2014 1:28 PM
49	25 cases per month.	6/25/2014 12:34 PM
50	1 case...this item is not native to my tribe	6/25/2014 12:17 PM
51	50	6/25/2014 11:36 AM
52	5 cases per month	6/25/2014 11:23 AM
53	50 cases Give each region \$ & let them select	6/25/2014 10:59 AM
54	2 cases	6/25/2014 10:53 AM
55	45 cases every other month	6/25/2014 10:45 AM
56	30 cases	6/25/2014 10:44 AM
57	120 - 150 per month	6/25/2014 10:28 AM
58	30 cases per month	6/25/2014 10:13 AM
59	40 cases a month	6/25/2014 10:11 AM
60	at least 20 cases a month	6/25/2014 10:09 AM
61	5 cases/monthly	6/25/2014 9:54 AM
62	4 case's ev. 3 months	6/25/2014 9:53 AM
63	15 cases for a 3 month period	6/25/2014 9:51 AM
64	if issuance is one per -300 cases per month initially	6/25/2014 9:44 AM
65	small program not much—3-4 cases a month.	6/25/2014 9:42 AM
66	20	6/25/2014 9:37 AM

Traditional Foods Survey 1

Q4 When USDA has approved the vendors for the other products listed above, what would your average monthly take rate be?

Answered: 66 Skipped: 0

Answer Choices	Responses
Salmon (in cases of 40 units)	63.64% 42
Blue Commeal (in cases of 40 units)	51.52% 34
Wild Rice (in cases of 40 units)	84.85% 56
Other (Please specify)	27.27% 18

#	Salmon (in cases of 40 units)	Date
1	10	7/31/2014 10:12 AM
2	30	7/28/2014 12:13 PM
3	36	7/24/2014 9:12 AM
4	10- 15 cases	7/22/2014 6:15 PM
5	0 – would not order this item	7/22/2014 3:15 PM
6	2 cases a month	7/17/2014 3:10 PM
7	none	7/17/2014 12:43 PM
8	1	7/8/2014 11:53 AM
9	difficult to project without consistant previous data	7/7/2014 1:18 PM
10	1 case	7/2/2014 4:30 PM
11	1 per month	7/1/2014 8:28 AM
12	2 cases = 80 cans	6/30/2014 3:12 PM
13	3-4	6/30/2014 10:08 AM
14	0	6/27/2014 12:17 PM
15	1 case	6/26/2014 3:58 PM
16	Less than 1 case per month (WE WOULD RATHER HAVE FRZN PORK CHOPS).	6/26/2014 12:53 PM
17	if canned not too many If Frozen would probly go better	6/26/2014 12:51 PM
18	5	6/26/2014 12:44 PM
19	160	6/26/2014 12:37 PM
20	1 case	6/26/2014 12:33 PM
21	2	6/26/2014 12:20 PM
22	2 - 3 cases a month	6/26/2014 10:55 AM
23	1	6/26/2014 10:30 AM
24	20	6/26/2014 10:22 AM
25	2 per month	6/26/2014 10:06 AM
26	40	6/25/2014 4:49 PM
27	20	6/25/2014 4:26 PM

Traditional Foods Survey 1

28	10	6/25/2014 4:23 PM
29	20	6/25/2014 3:00 PM
30	20	6/25/2014 2:11 PM
31	none	6/25/2014 1:28 PM
32	20 cs if frozen fillets.	6/25/2014 12:34 PM
33	1	6/25/2014 12:17 PM
34	20-30 units	6/25/2014 10:53 AM
35	10	6/25/2014 10:45 AM
36	3 cases	6/25/2014 10:44 AM
37	160	6/25/2014 10:28 AM
38	Canned or fresh???	6/25/2014 10:13 AM
39	about 5 cases a month	6/25/2014 10:09 AM
40	1	6/25/2014 9:51 AM
41	200 if frozen	6/25/2014 9:44 AM
42	depnds on what kind it is	6/25/2014 9:42 AM
#	Blue Cornmeal (in cases of 40 units)	Date
1	5	7/31/2014 10:12 AM
2	0	7/28/2014 12:13 PM
3	48	7/24/2014 9:12 AM
4	60 cases a month	7/23/2014 9:24 AM
5	60 cases	7/22/2014 6:15 PM
6	50 cs.	7/22/2014 3:58 PM
7	would order 30-40 cases	7/22/2014 3:15 PM
8	none	7/17/2014 12:43 PM
9	1	7/8/2014 11:53 AM
10	difficult to project without consistant previous data	7/7/2014 1:18 PM
11	1 case	7/2/2014 4:30 PM
12	22 cases	7/1/2014 10:07 AM
13	?	7/1/2014 8:28 AM
14	2 cases - 80 bags	6/30/2014 3:12 PM
15	5	6/30/2014 10:08 AM
16	1	6/27/2014 12:17 PM
17	0 case	6/26/2014 3:58 PM
18	Less than 10 cases per month	6/26/2014 12:53 PM
19	They would love to try....	6/26/2014 12:51 PM
20	120	6/26/2014 12:37 PM
21	1	6/26/2014 10:30 AM
22	1 per month	6/26/2014 10:06 AM
23	40	6/25/2014 4:49 PM
24	10	6/25/2014 4:23 PM

Traditional Foods Survey 1

25	40	6/25/2014 2:11 PM
26	none	6/25/2014 1:28 PM
27	None	6/25/2014 12:34 PM
28	1	6/25/2014 12:17 PM
29	40 units	6/25/2014 10:53 AM
30	5	6/25/2014 10:45 AM
31	8 cases	6/25/2014 10:44 AM
32	20	6/25/2014 10:28 AM
33	2	6/25/2014 9:51 AM
34	12	6/25/2014 9:44 AM
#	Wild Rice (in cases of 40 units)	Date
1	5	7/31/2014 10:12 AM
2	0	7/28/2014 12:13 PM
3	48	7/24/2014 9:12 AM
4	10 cases	7/22/2014 6:15 PM
5	50 cs.	7/22/2014 3:58 PM
6	would order slowly 20-30 cases see how it goes	7/22/2014 3:15 PM
7	20 cases	7/21/2014 4:08 PM
8	5 case	7/17/2014 12:43 PM
9	1	7/8/2014 11:53 AM
10	difficult to project without consistant previous data	7/7/2014 1:18 PM
11	1 case	7/2/2014 4:30 PM
12	10 cases	7/2/2014 11:06 AM
13	35 cases	7/1/2014 10:07 AM
14	3 per month	7/1/2014 8:28 AM
15	5 cases = 200 lbs	6/30/2014 3:12 PM
16	2	6/30/2014 10:08 AM
17	30 cases per month (2 lbs bags)	6/27/2014 4:49 PM
18	10 cases	6/27/2014 12:35 PM
19	0	6/27/2014 12:17 PM
20	20 CASES	6/27/2014 10:32 AM
21	4 cases	6/26/2014 3:58 PM
22	About 20 cases per month, depending on pack size.	6/26/2014 12:53 PM
23	all would be gone	6/26/2014 12:51 PM
24	4	6/26/2014 12:44 PM
25	400	6/26/2014 12:37 PM
26	2	6/26/2014 12:20 PM
27	4cases, wildrice should be parched over wood not propane or gas	6/26/2014 11:08 AM
28	20 cases per month (to startwith)	6/26/2014 10:55 AM
29	6 cases a month at least	6/26/2014 10:41 AM

Traditional Foods Survey 1

30	5 or more	6/26/2014 10:30 AM
31	60	6/26/2014 10:22 AM
32	15 cases for 3 month inventory	6/26/2014 10:06 AM
33	55 cases/mo if 2# per person, depending on guide rate	6/26/2014 10:02 AM
34	5	6/26/2014 7:11 AM
35	40	6/25/2014 4:49 PM
36	10	6/25/2014 4:23 PM
37	6 cases per month	6/25/2014 4:01 PM
38	20	6/25/2014 3:00 PM
39	2	6/25/2014 2:42 PM
40	40	6/25/2014 2:11 PM
41	25 cases	6/25/2014 1:28 PM
42	5 cs	6/25/2014 12:34 PM
43	2	6/25/2014 12:17 PM
44	2 cases per month	6/25/2014 11:23 AM
45	40 units	6/25/2014 10:53 AM
46	15	6/25/2014 10:45 AM
47	18 cases	6/25/2014 10:44 AM
48	20	6/25/2014 10:28 AM
49	25	6/25/2014 10:13 AM
50	30 cases a month depending on pond size 1# or 2#	6/25/2014 10:11 AM
51	around 15 cases a month	6/25/2014 10:09 AM
52	5 cases/monthly	6/25/2014 9:54 AM
53	2 case's ev. 3 months	6/25/2014 9:53 AM
54	15 cases in a 3 month period	6/25/2014 9:51 AM
55	30	6/25/2014 9:44 AM
56	10	6/25/2014 9:37 AM
#	Other (Please specify)	Date
1	unknown	7/31/2014 8:13 AM
2	48 pork, 48 dried corn, 24 fresh pumpkin, 24 yeast	7/24/2014 9:12 AM
3	hard to say, Canned salmon is a slow mover now in my area	7/17/2014 5:44 PM
4	difficult to project without consistant previous data	7/7/2014 1:18 PM
5	canned shellfish/seafoods 2 cases	7/2/2014 4:30 PM
6	A lot of sofke	7/1/2014 10:07 AM
7	Kidneys 10 cases = 120 units	6/30/2014 3:12 PM
8	Flint or Sweet Corn: 2000 units per month (1 lbs units)	6/27/2014 4:49 PM
9	tepyary beans- 20 cases month	6/27/2014 12:17 PM
10	3	6/26/2014 12:20 PM
11	3 cases, fns should let us buy from tribal members and native american	6/26/2014 11:08 AM
12	berries 8 cases a month	6/26/2014 10:41 AM

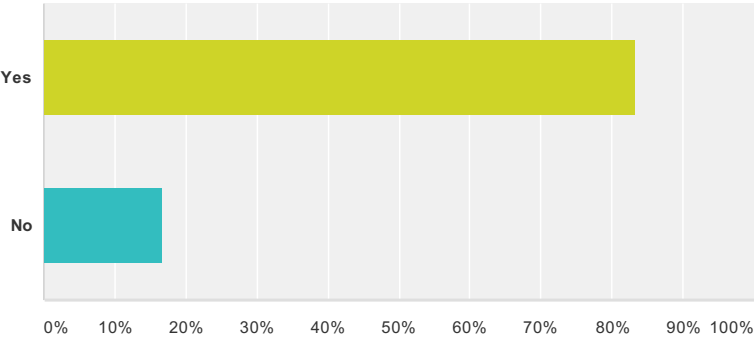
Traditional Foods Survey 1

13	30	6/25/2014 5:46 PM
14	40	6/25/2014 4:49 PM
15	80 Cases of Pork Chops Per Month	6/25/2014 2:11 PM
16	Pork 200 lbs month; Dried Sweet Corn 250 lbs month	6/25/2014 11:36 AM
17	Give each region \$ and they select their native food items	6/25/2014 10:59 AM
18	10 cases a month	6/25/2014 10:09 AM

Traditional Foods Survey 1

Q5 Would you like all the Native food items mentioned (bison, salmon, blue cornmeal, wild rice) to be delivered on a year-round basis?

Answered: 66 Skipped: 0



Answer Choices	Responses	
Yes	83.33%	55
No	16.67%	11
Total		66



Statement on Signing the Executive Order on Consultation and Coordination With Indian Tribal Governments

November 6, 2000

Today I am pleased to sign a revised Executive order on consultation with Indian tribal governments. This Executive order, itself based on consultation, will renew my administration's commitment to tribal sovereignty and our government-to-government relationship.

The first Americans hold a unique place in our history. Long before others came to our shores, the first Americans had established self-governing societies. Among their societies, democracy flourished long before the founding of our Nation. Our Nation entered into treaties with Indian nations, which acknowledged their right to self-government and protected their lands. The Constitution affirms the United States' government-to-government relationship with Indian tribes both in the Commerce Clause, which establishes that "the Congress shall have the Power To . . . regulate commerce . . . with the Indian Tribes," and in the Supremacy Clause, which ratifies the Indian treaties that the United States entered into prior to 1787.

Indian nations and tribes ceded lands, water, and mineral rights in exchange for peace, security, health care, and education. The Federal Government did not always live up to its end of the bargain. That was wrong, and I have worked hard to change that by recognizing the importance of tribal sovereignty and government-to-government relations. When I became the first President since James Monroe to invite the leaders of every tribe to the White House in April 1994, I vowed to honor and respect tribal sovereignty. At that historic meeting, I issued a memorandum directing all Federal agencies to consult with Indian tribes before making decisions on matters affecting American Indian and Alaska Native peoples.

Today, there is nothing more important in Federal-tribal relations than fostering true government-to-government relations to empower American Indians and Alaska Natives to improve their own lives, the lives of their children, and the generations to come. We

must continue to engage in a partnership, so that the first Americans can reach their full potential. So, in our Nation's relations with Indian tribes, our first principle must be to respect the right of American Indians and Alaska Natives to self-determination. We must respect Native Americans' rights to choose for themselves their own way of life on their own lands according to their time honored cultures and traditions. We must also acknowledge that American Indians and Alaska Natives must have access to new technology and commerce to promote economic opportunity in their homelands.

Today, I reaffirm our commitment to tribal sovereignty, self-determination, and self-government by issuing this revised Executive order on consultation and coordination with Indian tribal governments. This Executive order builds on prior actions and strengthens our government-to-government relationship with Indian tribes. It will ensure that all Executive departments and agencies consult with Indian tribes and respect tribal sovereignty as they develop policy on issues that impact Indian communities.

**Executive Order 13175—
Consultation and Coordination
With Indian Tribal Governments**

November 6, 2000

By the authority vested in me as President by the Constitution and the laws of the United States of America, and in order to establish regular and meaningful consultation and collaboration with tribal officials in the development of Federal policies that have tribal implications, to strengthen the United States government-to-government relationships with Indian tribes, and to reduce the imposition of unfunded mandates upon Indian tribes; it is hereby ordered as follows:

Section 1. Definitions. For purposes of this order:

(a) "Policies that have tribal implications" refers to regulations, legislative comments or proposed legislation, and other policy statements or actions that have substantial direct effects on one or more Indian tribes, on the relationship between the Federal Government and Indian tribes, or on the distribution

of power and responsibilities between the Federal Government and Indian tribes.

(b) "Indian tribe" means an Indian or Alaska Native tribe, band, nation, pueblo, village, or community that the Secretary of the Interior acknowledges to exist as an Indian tribe pursuant to the Federally Recognized Indian Tribe List Act of 1994, 25 U.S.C. 479a.

(c) "Agency" means any authority of the United States that is an "agency" under 44 U.S.C. 3502(1), other than those considered to be independent regulatory agencies, as defined in 44 U.S.C. 3502(5).

(d) "Tribal officials" means elected or duly appointed officials of Indian tribal governments or authorized intertribal organizations.

Sec. 2. Fundamental Principles. In formulating or implementing policies that have tribal implications, agencies shall be guided by the following fundamental principles:

(a) The United States has a unique legal relationship with Indian tribal governments as set forth in the Constitution of the United States, treaties, statutes, Executive Orders, and court decisions. Since the formation of the Union, the United States has recognized Indian tribes as domestic dependent nations under its protection. The Federal Government has enacted numerous statutes and promulgated numerous regulations that establish and define a trust relationship with Indian tribes.

(b) Our Nation, under the law of the United States, in accordance with treaties, statutes, Executive Orders, and judicial decisions, has recognized the right of Indian tribes to self-government. As domestic dependent nations, Indian tribes exercise inherent sovereign powers over their members and territory. The United States continues to work with Indian tribes on a government-to-government basis to address issues concerning Indian tribal self-government, tribal trust resources, and Indian tribal treaty and other rights.

(c) The United States recognizes the right of Indian tribes to self-government and supports tribal sovereignty and self-determination.

Sec. 3. Policymaking Criteria. In addition to adhering to the fundamental principles set forth in section 2, agencies shall adhere, to the extent permitted by law, to the following

criteria when formulating and implementing policies that have tribal implications:

(a) Agencies shall respect Indian tribal self-government and sovereignty, honor tribal treaty and other rights, and strive to meet the responsibilities that arise from the unique legal relationship between the Federal Government and Indian tribal governments.

(b) With respect to Federal statutes and regulations administered by Indian tribal governments, the Federal Government shall grant Indian tribal governments the maximum administrative discretion possible.

(c) When undertaking to formulate and implement policies that have tribal implications, agencies shall:

- (1) encourage Indian tribes to develop their own policies to achieve program objectives;
- (2) where possible, defer to Indian tribes to establish standards; and
- (3) in determining whether to establish Federal standards, consult with tribal officials as to the need for Federal standards and any alternatives that would limit the scope of Federal standards or otherwise preserve the prerogatives and authority of Indian tribes.

Sec. 4. Special Requirements for Legislative Proposals. Agencies shall not submit to the Congress legislation that would be inconsistent with the policymaking criteria in Section 3.

Sec. 5. Consultation. (a) Each agency shall have an accountable process to ensure meaningful and timely input by tribal officials in the development of regulatory policies that have tribal implications. Within 30 days after the effective date of this order, the head of each agency shall designate an official with principal responsibility for the agency's implementation of this order. Within 60 days of the effective date of this order, the designated official shall submit to the Office of Management and Budget (OMB) a description of the agency's consultation process.

(b) To the extent practicable and permitted by law, no agency shall promulgate any regulation that has tribal implications, that imposes substantial direct compliance costs on Indian tribal governments, and that is not required by statute, unless:

- (1) funds necessary to pay the direct costs incurred by the Indian tribal government or the tribe in complying with the regulation are provided by the Federal Government; or
 - (2) the agency, prior to the formal promulgation of the regulation,
 - (A) consulted with tribal officials early in the process of developing the proposed regulation;
 - (B) in a separately identified portion of the preamble to the regulation as it is to be issued in the *Federal Register*, provides to the Director of OMB a tribal summary impact statement, which consists of a description of the extent of the agency's prior consultation with tribal officials, a summary of the nature of their concerns and the agency's position supporting the need to issue the regulation, and a statement of the extent to which the concerns of tribal officials have been met; and
 - (C) makes available to the Director of OMB any written communications submitted to the agency by tribal officials.
- (c) To the extent practicable and permitted by law, no agency shall promulgate any regulation that has tribal implications and that preempts tribal law unless the agency, prior to the formal promulgation of the regulation,
- (1) consulted with tribal officials early in the process of developing the proposed regulation;
 - (2) in a separately identified portion of the preamble to the regulation as it is to be issued in the *Federal Register*, provides to the Director of OMB a tribal summary impact statement, which consists of a description of the extent of the agency's prior consultation with tribal officials, a summary of the nature of their concerns and the agency's position supporting the need to issue the regulation, and a statement of the extent to which the concerns of tribal officials have been met; and
 - (3) makes available to the Director of OMB any written communications submitted to the agency by tribal officials.
- (d) On issues relating to tribal self-government, tribal trust resources, or Indian tribal treaty and other rights, each agency should explore and, where appropriate, use consensual mechanisms for developing regulations, including negotiated rulemaking.
- Sec. 6. Increasing Flexibility for Indian Tribal Waivers.**
- (a) Agencies shall review the processes under which Indian tribes apply for waivers of statutory and regulatory requirements and take appropriate steps to streamline those processes.
- (b) Each agency shall, to the extent practicable and permitted by law, consider any application by an Indian tribe for a waiver of statutory or regulatory requirements in connection with any program administered by the agency with a general view toward increasing opportunities for utilizing flexible policy approaches at the Indian tribal level in cases in which the proposed waiver is consistent with the applicable Federal policy objectives and is otherwise appropriate.
- (c) Each agency shall, to the extent practicable and permitted by law, render a decision upon a complete application for a waiver within 120 days of receipt of such application by the agency, or as otherwise provided by law or regulation. If the application for waiver is not granted, the agency shall provide the applicant with timely written notice of the decision and the reasons therefor.
- (d) This section applies only to statutory or regulatory requirements that are discretionary and subject to waiver by the agency.
- Sec. 7. Accountability.**
- (a) In transmitting any draft final regulation that has tribal implications to OMB pursuant to Executive Order 12866 of September 30, 1993, each agency shall include a certification from the official designated to ensure compliance with this order stating that the requirements of this order have been met in a meaningful and timely manner.
- (b) In transmitting proposed legislation that has tribal implications to OMB, each agency shall include a certification from the official designated to ensure compliance with this order that all relevant requirements of this order have been met.

(c) Within 180 days after the effective date of this order the Director of OMB and the Assistant to the President for Intergovernmental Affairs shall confer with tribal officials to ensure that this order is being properly and effectively implemented.

Sec. 8. Independent Agencies. Independent regulatory agencies are encouraged to comply with the provisions of this order.

Sec. 9. General Provisions. (a) This order shall supplement but not supersede the requirements contained in Executive Order 12866 (Regulatory Planning and Review), Executive Order 12988 (Civil Justice Reform), OMB Circular A-19, and the Executive Memorandum of April 29, 1994, on Government-to-Government Relations with Native American Tribal Governments.

(b) This order shall complement the consultation and waiver provisions in sections 6 and 7 of Executive Order 13132 (Federalism).

(c) Executive Order 13084 (Consultation and Coordination with Indian Tribal Governments) is revoked at the time this order takes effect.

(d) This order shall be effective 60 days after the date of this order.

Sec. 10. Judicial Review. This order is intended only to improve the internal management of the executive branch, and is not intended to create any right, benefit, or trust responsibility, substantive or procedural, enforceable at law by a party against the United States, its agencies, or any person.

William J. Clinton

The White House,
November 6, 2000.

[Filed with the Office of the Federal Register,
8:45 a.m., November 8, 2000]

NOTE: This Executive order was published in the *Federal Register* on November 9.

Statement on Signing the Foreign Operations, Export Financing, and Related Programs Appropriations Act, 2001

November 6, 2000

Today I am pleased to sign into law H.R. 4811, the Foreign Operations, Export Financing, and Related Programs Appropriations Act, 2001. As I have often said, there is a right and a wrong way to conduct budget negotiations. When we have worked together, we have unfailingly made progress. When there is a genuine spirit of cooperation and compromise, we can accomplish great things for our people. This Act, the result of just such a bipartisan effort, supports our efforts to promote peace and stability around the world, in turn helping to make our Nation more safe and secure.

I am particularly pleased that this legislation funds our landmark initiative to provide debt relief to the poorest of the world's nations. By fully funding our commitment to debt relief, the bill supports this historic effort to give these poorest countries a critical opportunity to effect reform while using funds to reduce poverty and provide basic health care and education for their people. I commend the bipartisan efforts in the Congress to fund this vital program, as well as efforts of all those across the political spectrum who joined forces to secure this critically important funding.

Likewise, I am pleased that this legislation dramatically increases funding to fight HIV/AIDS. In nations around the world, HIV/AIDS is a leading cause of death and is undermining decades of effort to reduce mortality, improve health, expand educational opportunities, and lift people out of poverty. The funds provided by the bill will significantly expand our prevention and treatment efforts in Africa and other regions of the world to turn the tide against this deadly pandemic.

This legislation also helps strengthen our efforts to support democracy and stability in Southeastern Europe, the Newly Independent States, and other key regions. In particular, it includes increased funding for our continued efforts to support democracy and reform in Kosovo, and to support the



National Association of Food Distribution Programs on Indian Reservations

March 14, 2014

Under Secretary Kevin Concannon
U.S. Department of Agriculture
1400 Independence Ave., S.W.
Washington, DC 20250

Administrator Audrey Rowe
U.S. Department of Agriculture
1400 Independence Ave., S.W.
Washington, DC 20250

Deputy Under Secretary Janey Thornton
U.S. Department of Agriculture
1400 Independence Ave., S.W.
Washington, DC 20250

Laura Castro, Director
U.S. Department of Agriculture
3101 Park Center Drive, Room 504
Alexandria, VA 22302-1594

Dear Mr. Concannon, Ms. Thornton, Ms. Rowe and Ms. Castro:

The Board and membership of the national FDPIR organization (NAFDPIR) congratulate the Department and FNS in the recent passage of the 2014 Farm Bill by Congress. We know it was long sought after by the Department and will provide a strong foundation for the people we serve in rural America. NAFDPIR stands ready to assist the department in implementing these important new provisions. We represent 275 tribes (over half of all federally recognized tribes) in the most important issues to our communities - access to food.

Our purpose in writing to you today is to begin a discussion about several items that have been on the NAFDPIR national membership agenda for some time. We seek an audience with the Secretary, the Under Secretary's office and FNS leadership to discuss these matters further and look forward to your written response to our discussions offered below.

Food Availability

In the recent government shutdown the FDPIR sites saw an increase in participation. We request FNS work as transparently as possible with us to ensure we do not have people going hungry in our 275 tribal communities. Our program serves over half of all federally recognized tribes and we need to make sure that the coming changes in the SNAP program do not impact our ability to feed our people. We are sure you do not want that outcome either. But in the vein of a "lean warehouse" policy and the coming decline in participation in SNAP, we believe we are the canary in the coalmine in Indian Country and we seek your assistance and support to make sure children and elders are fed.

Tod Robertson, President
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Southwest Region
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MIDWEST REGION
Susie Roy
Leech Lake Chippewa

MOUNTAIN PLAINS
Mary Greene-Trottier
Spirit Lake Sioux Tribe

SOUTHWEST REGION
Perry Martinez
Eight Northern
Indian Pueblo Council Inc.

WESTERN REGION
Jenelle Gimlin
State of Nevada

Lean Warehouse Policy

We are deeply concerned about what could be a shift in policy to a "lean warehouse" concept and are concerned that if in fact FNS has shifted to such a policy, that no one discussed this matter with our leadership in the spirit of tribal consultation specifically important to this critical feeding program in Indian Country. We request a special meeting and a written response to these concerns and a full explanation of what a "lean warehouse" concept will mean for practical purposes within the FDPIR program.

Status Report – FDPIR Study

We request an immediate in-person meeting between FNS, FDPIR federal staff and the NAFDPIR board and leadership to discuss this study and report. We invite representatives of the Urban Institute to take part in such a meeting. Without our input we don't believe a solid report can be delivered. Paying people to complete a survey will ensure that biased input is received, and the study managers are paying individuals within our communities to provide input. We (as a board) would appreciate providing input on the actual survey and we believe that a survey design and process design delivery without our input will result in a flawed outcome and report. It is not too late to fix this process and we are not requesting that the contract be rejected or even modified. What we do believe is that NAFDPIR needs to have a voice in the project, know the status in real time, have an opportunity to provide input to the survey designers, and have an opportunity to review and provide comment to any draft of a report to FNS and/or Congress before that report is made final.

Continued Concerns: Late Deliveries, BIUB Dating, Shipments of Unusable Product and Creation of a Formal Complaint Mechanism

We request FNS take immediate steps to do the following: 1) ensure that the national warehouse deliveries are made in a timely manner; 2) ensure that companies delivering product are not allowed to deliver unusable product to our feeding sites; 3) ensure that the value of those foods is recouped into the FDPIR budget so that we can order and receive food in a timely manner for use by Indian people. We request a meeting and written response to this issue and we strongly request that should you determine that the fault lies with the companies who are under contract with you to deliver food to our sites, that you take immediate steps to release those companies from their contracts with the federal government or take immediate steps to cure these deficiencies.

Matching Funds Requirements

FDPIR intends to approach Congress to seek legislative language to relieve us from the match requirement. We request USDA/FNS join us in this request. At present, ITOs do not receive enough administrative funding to fulfill their needs in managing these important feeding programs. The programs need to be funded at 100% administrative costs to deliver the program and thereby meet the needs of individual ITOs that can be vastly different, tribe-to-tribe. The federal government is adopting new policies in 638 programs government-wide to ensure that tribes recover full administrative costs in their management of programs. Ensuring FDPIR is in line with these new developments is important.

Support for More Funds for Tribal Nutrition Education

Finally, for too long the FDPIR program has been ineligible to seek and obtain funds from the full array of nutrition education programs available throughout the United States through USDA. Using the scant \$1m or less available to us, we have designed and delivered a strong portfolio of nutrition

education projects, but the nutrition and health conditions in Indian Country are so profoundly more epidemic than the rest of the country that it simply makes no sense to cut our programs off from access to the full portfolio of nutrition education funds available. Tribes have demonstrated over and over again that we are best at educating our own people about the choices they make when we do so from within, using traditional and culturally appropriate approaches and language. We need your help to make sure these doors are unlocked. That can be accomplished through ensuring Tribal governments and Tribal colleges have access to nutrition education programs in which they are currently ineligible to participate.

Carry Forward Policy

We request that FNS amend its carry forward policy with regard to operating budgets of the entire FDPIR program. NAFDPIR has passed several resolutions seeking changes to the federal funds carry forward policy. At present, the ITOs lack federal permission to allow the carry forward of unused funds year to year. If carry forward of funds were allowed, the funds could be redirected with federal approval to improve program food delivery infrastructure or provide additional much needed nutrition education. We request FNS provide a plan for amending this carry forward policy.

Outdated Ordering Systems

We request that FNS, as part of Secretary Vilsack's ongoing and important efforts to bring modern technology advancements to USDA as well as his efforts to bring "Lean Six Sigma" business management efficiencies into the department, take a strong look at the possibilities of having Tribal technology departments provide input and insight on how best the systems used in feeding programs can be upgraded. We have several Tribal governments that are highly advanced in technology adoption, several Tribes that have technology contracts with the federal government, and many Tribal governments that have adopted the principles of Lean Six Sigma into their own operations. It seems to us that a unique partnership could be forged between these Tribes and USDA to ensure that programs with authority to only serve Tribal citizens are operated in the most efficient manner possible, and in so doing, create models for other programs within the department. NAFDPIR offers to put USDA and FNS officials in touch with these professionals within Indian Country and do whatever we can to further this concept. At a minimum, the AIS, WBSCM and FFAVORS programs should be reviewed as a whole to determine the ability to roll all these duplicative programs into one overarching program, thus reducing redundancy, waste, and technological inefficiencies.

Traditional Foods in the FDPIR Package

The 2014 Farm Bill had two provisions drawing attention to the importance of traditional foods. We request your attention to ensuring that traditional foods have a permanent place in the FDPIR package and ask that you set up a special team within FNS and USDA, to include a member of the USDA Office of Tribal Relations staff (which was made permanent in this Farm Bill). We also respectfully request that this special team have several members of the NAFDPIR leadership and membership that are representative of the vast array of traditional foods sources available in Indian Country. We suggest that this activity could also be one of the components considered by the Multiagency Task Force mandated by Section 4205 of the Agricultural Act of 2014. In addition, we request that FNS award the \$1m authorized for the traditional foods study to an entity with intimate knowledge of the FDPIR program and that the study itself be designed in such a way that we do not repeat the problems associated with the current FDPIR study being conducted by the Urban Institute as discussed below. We know there are several entities that have unique and informed knowledge of Indian Country, both in terms of knowledge of the consumer in Indian Country, the producer in

Indian Country, the culture surrounding traditional foods, and the challenges and opportunities in this arena. These entities know Indian Country and have the integrity and academic professionalism to provide a unique opportunity to further Indian Country's overarching goals of improving the Native food and agriculture sector and our ability to feed our people.

Support for Tribal Management of All Feeding Programs

We also point to the provisions in the new Farm Bill that give support to the possibility of turning over full management of ALL feeding programs under FNS authority to Tribal governments, where appropriate. The 275 Tribal governments who regularly manage FDPIR programs, and other Tribal governments who manage a vast array of other government services, have more than demonstrated their capacity, interest, and expertise to manage feeding our own people. NAFDPIR stands ready to play a role when such decisions are made and studies are conducted so that we can pave the way for a new partnership between Tribal governments and USDA in these critical areas to our people - nutrition and health and food. We also believe that Tribal governments who do step forward to manage those programs can do so in a seamless and cooperative way with the State governments operating feeding programs off tribal lands.

Traditional Foods Availability in Indian Country Public Institutions

We request that USDA FNS actively seek and obtain seat(s) for NAFDPIR leadership and membership on a special team made up of members of the USDA and FDA staff responsible for implementing this provision of the new 2014 Farm Bill. We believe that FDPIR program managers and leadership have unique insight into how this provision of the Farm Bill will evolve and we strongly believe that a work team without FDPIR presence will exclude an important voice with experience on the ground in food purchasing, positioning, feeding, and health/nutrition planning and education in Indian Country. An effort to implement this section of the new Farm Bill without a seat at the table for our program managers who confront on a daily basis the needs of our people for food would be a tragic oversight.

Thank you for your kind attention to these complex and important matters. We congratulate the Department on the recent passage of a long-overdue Farm Bill and we stand ready to assist you in every way possible to make sure its benefits reach Indian Country.

Sincerely,



Tod Robertson
President, NAFDPIR (on behalf of the its members)

CC: National Congress of American Indians
USDA Office of the Secretary
USDA Office of Tribal Relations
Senate Committee on Indian Affairs

CC: Tribes participating in FDPIR (275)

CC: Olsson Frank Weeda Terman Matz, PC



National Association of Food Distribution Programs on Indian Reservations

August 12, 2015

The Honorable Tom Vilsack
Secretary
U.S. Department of Agriculture
1400 Independence Ave., SW
Washington, DC 20250

Under Secretary Kevin Concannon
U.S. Department of Agriculture
1400 Independence Ave., SW
Washington DC 20250

Audrey Rowe, Administrator
Food and Nutrition Service
U.S. Department of Agriculture
1400 Independence Ave., SW
Washington DC 20250

Laura Castro, FDPIR Director
Food and Nutrition Service
U.S. Department of Agriculture
1400 Independence Ave., SW
Washington DC 20250

Dear Secretary Vilsack:

The Board and membership of the national organization (NAFDPIR), serving all Federally Recognized Tribal Nations (567), that have citizens participating in the Food Distribution Program on Indian Reservations (FDPIR) are reaching out to formally request an audience with you to discuss current and long-standing situations affecting the administration and management of FDPIR. The NAFDPIR is comprised of Tribes who are served by the FDPIR program and a few State officials serving Tribes who receive food packages under the FDPIR program.

On March 14, 2014 we requested an audience with Under Secretary Concannon to discuss a long list of concerns we had with regard to the FDPIR program. We followed with another letter in early May 2014 reiterating that request when we received no response to our March letter. Finally, in June 2014 we were granted an audience with Under Secretary Concannon. The written response we received thereafter was inadequate and in most cases did not address our concerns.

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Mary Greene-Trottier
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SOUTHWEST REGION
Perry Martinez
Eight Northern
Indian Pueblo Council Inc.

WESTERN REGION
Jenelle Gimlin
State of Nevada

Since that time (over a year ago) minimal action has been taken to address the ongoing concerns we have expressed to the FDPIR Director's office and their staff, the national warehouse personnel, as well as the Under Secretary's office.

Most recently, we met with Under Secretary Concannon during the annual FDPIR meeting in Albuquerque. Present were over 15 senior elected Tribal officials (Governors, Chairmen, Principal Chiefs of multiple Tribal Nations) and senior officials of FNS. While there has been recent movement to purchase bison for the FDPIR package, the vast number of issues we raised with the Under Secretary are still unresolved and we request an audience with you to determine a path forward in the remaining months of your administration.

We believe addressing these long-standing issues with FDPIR, while also making important new improvements in FDPIR, can leave a lasting legacy of improvement to this important programs. We briefly outline the issues needing resolution below, along with our proposed solutions.

Immediate Request: Seat a Working Group

We request you seat a working group as soon as possible, made up of officials from USDA FNS, your office, the USDA Office of Tribal Relations and at least 10 representatives of Tribal nations. Many of the elected Tribal officials attending our recent meeting Albuquerque should be appointed members of the working group and have already expressed willingness to Under Secretary Concannon to serve in that capacity. We respectfully request their charge be to address the issues we outline below:

- **Improve Inefficient Computer Interface Systems**
 - Our offices have many challenges interfacing with the present software food ordering system in use by the federal government. It is outdated, does not allow real time communication between distribution sites (even those located on the same reservations) and requires some sites to resort to pencil and paper in order to accomplish their work.
 - **Solution:** Many of our Tribal nations have advanced technology staffs and would be willing to assist the government in re-designing the system we currently must use. Modernization of the AIS, SBSCM, and FFAVORS software systems FDPIR must use can occur without new appropriations and we believe can be a legacy of other efforts within USDA to modernize software systems and bring about greater efficiency. In our case, it would also alleviate many frustrations of our program sites as well.
- **Seek Appropriate Levels of Funding to Meet Present and Future Needs**
 - We have expressed continuing concerns spanning multiple administrations concerning the funding methodology in use for FDPIR. There are growing needs for increased funding for FDPIR, yet FDPIR still is tied to SNAP and the funding requests and methodology for forecasting needs for the program are inadequate. Example: in FY 2015 FDPIR's funding level was \$145m with estimated 96,500 people participating in

the program; in FY 2016, with sustained increase in participants over 102,000 (and additional sites being denied in AK) the funding levels are the same as in the prior FY. Some FDPIR sites have a sustained 100% increase in participation while others have seen sustained increase in the 50%+ range.

- **Solution:** Administrative funding for ITO sites should not have to be competed for between existing programs. Funding levels must increase and additional appropriations negotiated, requested and secured. FDPIR needs to move to a needs-based negotiated budget process in tribal consultation with elected tribal leadership using the following criteria:
 - Actual and projected participant numbers
 - Ability to adjust participation numbers in real time as numbers increase
 - Regular incremental increases adjusted to inflation and increased costs in food and transportation
 - Funding adequate to
 - bring on additional sites in times of proven need,
 - to address emergency situation,
 - to address chronic infrastructure and capital improvements needs of FDPIR sites, and
 - to addressing severe staffing needs at the Tribal level.
- Alaska sites are being requested but denied while villagers are experiencing significant declines in their subsistence food sources and they live in communities without basic infrastructure and no readily available food retail locations
 - **Solution:** Create a new funding mechanism for Alaska Native villages who request participation in FDPIR so that the lower 48 participation sites are not impacted in bringing on new Alaska sites
- **Address Food Availability and Food Shortages and Develop Contingency Plans**
 - The FDPIR food package has experienced periods in the last two years where up to 30% of the 80 items on the approved food package ordering menu have been **unavailable** for ordering from the national warehouse. At one point all meat proteins except one were unavailable.
 - In addition to increased participation numbers, we are also concerned about other possible threats to food availability such as the recent 2015 avian flu outbreak which has led to higher meat and egg prices, shortages in the red meat supply leading to absence in the food package and other possible impacts of climate and food supply chain disruptions.

- All these problems lead to lack of food on the warehouse shelves that mean lack of foods at the program participant level.
- SNAP is not an alternative to address these situations as most of our rural and remote communities which is where our participation in FDPIR is located live in “food deserts” as defined by USDA, with no or extremely limited retail food sites within reasonable driving distance.
- When food shortages occurred, FDPDIR staff appeared to be caught unawares and we are deeply concerned that their responses to our inquiries were met with “there is some food available”. Such responses should be unacceptable to all.
 - **Solution:** We need the working group mentioned above to negotiate specifically with USDA for the creation of contingency plans that are comprehensive and proactive in nature.
- **Reject Lean Warehouse Policy Implementation**
 - In recent years, FDPIR has imposed a “lean warehouse policy” without tribal consultation and with almost no explanation as to the meaning of such policy. In the private sector such terminology means a “just in time” ordering and fulfilling requirement along with the image that a centralized or decentralized warehouse will have very little on the shelves on a continuing basis. We actually have pictures of some program sites that now have very little to no foods on the shelves.
 - Such a policy is furthered by new rules (7 CFR Parts 250 and 251) limiting the program’s inventory on-hand and the inclusion of sections within the new regulations that allow for prosecution for violation of the rule.
 - Such policies are unable to be effectively and efficiently administered by federal employees with no understanding of private retail management of such a system. A lean warehouse policy in FDPIR means that the risk of being unable to feed tribal citizens is more real than ever. And the risk of prosecution for keeping surplus foods on the shelves of remote and under-resourced communities is troublesome at the least.
 - **Solution:** Immediately take steps to reverse the “lean warehouse” policy; reverse prosecution language in the new rules; and incorporate within the scope of the working group requested above the charge to develop a plan for effective warehouse management that allows for carrying of surplus at the local level.
- **Reinstate Regional Vendor Pilot , Cure Defects in the Feasibility Study of Tribal Management of Feeding Programs, and Change Policy Concerning FDPIR Studies**
 - The FDPIR program has been the subject of numerous studies. We are routinely not allowed in-person meetings to discuss the studies nor

ensuing reports. Our means to input ongoing studies are never clarified and our ability to review reports before they are released is not allowed.

- The most recent study of FDPIR has been commissioned (as have all previous studies) to urban-based consulting groups with no ongoing relationships with Indian Country. To our knowledge the study still has not been released. While these researchers may be well-known to FNS staff in DC, they are an unknown entity to Indian Country and as such we question their ability to draw logical insightful conclusions regarding how FDPIR functions at the local level. There are many qualified Native research groups and their engagement is important to ensure validity of any future studies and surveys.
- A recent “regional vendor pilot” which was authorized in the 2008 Farm Bill, undertaken but cut short, is of particular concern to FDPIR. The regional pilot was stopped prematurely and no efforts were made to continue the study. The excuse given was that the study was “too expensive” however no costs were shared with the tribes to ascertain whether cost savings could have been achieved in creative ways. The most troublesome part of the cessation is that the regional vendor was totally in alignment with the Secretary’s focus on regional rural development and while it was in effect, the regional approach vastly increased the numbers of participants who shifted to more fruits and vegetable choices in the package.
 - **Solutions:** The regional vendor pilot program needs to be re-launched so that it could be adequately evaluated. FNS needs an improved approach to studying FDPIR that incorporates meaningful elected tribal leader consultation.

- **Address Ongoing Problems in Unusable Product and Best If Used By (BIUB)**

- **Dates**

- For a period of one and one-half years, the programs operating in the Midwest Region were given unusable (rotten or rotting) fruits and vegetables. When we met with Under Secretary Concannon, he appeared to be unaware of this problem, even though the NAFDPIR board repeatedly advised FNS staff of the problem.
 - Likewise, when we have product on hand that is within thirty (30) days of the BIUB dates, we are required to donate that product to non-tribal feeding programs and we are not allowed to have the value of that product recouped within the FDPIR budgets. In every case, product that is close to the BIUB date is delivered not through any fault of FDPIR program managers, nor our participants.
 - Most FDPIR sites have experienced multiple instances of federal contractors delivering product to our sites within days of exceeding the BIUB date.

- In addition, the “online complaint system” that FDPIR program sites are told to utilize when problems in shipments occur is so severely understaffed and late in oversight to make it almost unusable.
- New regulations and FNS guidance (7 CFR parts 250 and 251) is exacerbating these issues by making tribal government feeding sites obtain an inspection of donated foods by state or local health officials before transferring the foods, and holding them legally liable for receiving rotting products, as opposed to holding the federal government contractor responsible for fulfilling their responsibilities to deliver fresh, unusable product in a timely manner.
- Finally, in some cases, the BIUB dates have been completely removed from some food products delivered to our sites, making it impossible for tribal feeding sites to track conditions of the products or expiration dates.
 - **Solution:** An entire overhaul of how the agency deals with federal contractors whose actions result in delivery of poor quality or unsafe food products is necessary, as is a scrutiny of the entire BIUB policies and the adverse impact of those policies at the tribal level. FNS should take steps to draft new rules and guidance to relieve tribal governments of seeking state or local food safety inspections and holding them liable for being in possession of questionable food product when in fact, that food was delivered to them in such a condition. A working complaint system must be instituted. Finally, FNS should change its policy and not adversely impact the budget of tribal feeding sites if they are delivered and must thereafter donate product approaching its BIUB date.
- **Amend Matching Funds Requirements**
 - Each tribal feeding site must provide a 25% match in order to participate in the FDPIR program and if a site requests a waiver of that requirement; some sites are punished by the lowering of their full budget allocations by the 25% match for which they sought a waiver. This is occurring in some locations but not all.
 - **Solution:** It is our understanding that each Regional Office is required to increase federal funding to program sites to 100% to provide for the full operation of the program. However, given that the match problems identified above still occur in some locations, at minimum this inconsistently in implementation should be addressed.
- **Improve Support for Tribal Nutrition Education**
 - We have repeatedly sought support from FNS to secure additional funding for nutrition education. These tribes serving members of all 567 federal recognized tribes have normally less than \$1.25m available to them in nutrition education. Each of the over 100 ITOs must compete for

this small pot of money. By contrast, the Nutrition Education Grant program funded under SNAP received \$400m Tribal communities, whose diabetes, obesity and other adverse health impacts that trace back to nutrition and food access, are the worst in the nation.

- Tribes are excluded from eligibility from many other important nutrition education funding streams found elsewhere in USDA
 - **Solution:** FNS and USDA must seek appropriations, not to be offset out of the FDPIR program itself, to remedy this situation. We strongly suggest seeking additional funding of at least \$10m annually within one year and at least \$30m annually within the net five years.

- **Change Carry Forward Policy**

- Tribal program sites are not allowed to carry forward unused funds, whereas states are allowed to do so. Unused funds normally occur within the FDPIR program tied to delays and in effective federal management decisions, not through fault of the tribes. If carry forward funding is not allowed, then another alternative should be pursued such as allowing re-allocation of funds to allow for improved educational funding, technology, brick-and-mortar warehouses at the tribal program level, or other pressing needs of the program). At present those funds are captured and reused elsewhere by the federal government when there are long lists of outstanding needs for such unused funds within FDPIR.
 - **Solution:** FNS needs to work with tribes to amend its regulations and if necessary seek new legislation that will allow for carry forward of unused funds and reallocation to other program needs.

- **Institute Aggressive Traditional Foods Procurement Policies**

- Congress has instructed FNS for three consecutive Farm Bills that traditional foods are authorized for the FDPIR food package, yet this is still not happening. It is not until your administration that a bison RFP was issued, which due to failures of the contractor, was not fully completed. Thereafter we had to wait another four years until a new bison RFP was issued (within the last month). We still do not have bison in the package. We also do not have blue corn, wild rice, salmon or other traditional foods, all of which are established nutritionally equivalent to similar foods and all of which are found in the commercial marketplace and meet specific food safety requirements.
- USDA staff consistently advises our program sites that special/supplemental appropriations are required in order to purchase traditional foods, however this is not found in the laws passed by Congress. It is our legal opinion that the funds used to purchase foods for the food package could be used at any time to purchase traditional foods,

particularly those that are commonly available in commercial retail markets (such as those listed above).

- FDPIR program manager surveys reveal a high desire (80%) for traditional foods and our surveys have provided FNS with exact ordering patterns that could be used to regularly procure these culturally important and nutritionally equivalent foods.
- Such foods are even recognized as appropriate for purchase in all Child Nutrition Programs according to a newly issued guidance (July 2015).
- We were recently advised that a researcher from outside Indian Country was told by FNS personnel that “FDPIR is a national program that must meet national tastes” and thus would never have traditional foods in the package; and prior to that, we were advised in writing that one of the FNS nutritionists expressed that as long as they were involved in the program, traditional foods would never be purchased.

- **Solution:** Traditional foods exist in the commercial marketplace and as such should be included within the approved food package immediately and steps taken by USDA to work with Tribal producers to ensure they can meet all the necessary requirements to have traditional foods they produce eligible for food procurement contracts. FNS needs to place all requested traditional foods on a regular buying schedule, that is regionally relevant to the tribes residing in those regions in compliance with expressed Congressional direction.

- **Ensure Most Recent Study of Tribal Management of all Feeding Programs Accurately Reflects Tribal Government Policies**

- As mandated in the 2014 Farm Bill, FNS is to undertake a separate study (which is currently underway) to determine the feasibility of Tribal management of all feeding programs.
- NCAI has already expressed Tribal governments’ interest in managing all feeding programs affecting our citizens - - precisely as we choose to exercise self-governance in managing health care, construction, housing, roads, and other related infrastructure and inherently governmental services for our lands and people.
- The study currently underway is deeply flawed in concept and design; Tribal governments must be consulted with before any report related to this study is released to Congress.
 - **Solution:** FNS chose to only focus on four programs in management this study, while Congress directed FNS to study feasibility of having tribal governments manage ALL feeding programs. This study must not be reported to Congress in its current form as it did not respond to the concerns relating to its flawed design and methodology, was too narrow in scope, and it has not incorporated meaningful Tribal input. Tribal governments

have expressed their desires to self-govern in all feeding programs for several years and this request, which found its way into the most recent Farm Bill, should be honored. Robust tribal consultation with elected tribal officials must occur before the draft report is made final and submitted to Congress.

Tribes have a special relationship to the federal government that is not bound up in our status as a minority or ethnic group; it is bound up in our political status in relation to the federal government. We have innumerable treaties and other federal laws and court rulings that define that relationship, many of which specifically identify the responsibility of the federal government to provide food and access to food for our people in response to the lands and resources our ancestors provided to the early United States.

We request a meeting with you personally as soon as one can be arranged. We will provide our NAFDPIR board and senior experts, who together have a combined knowledge and management of this program of over 150 years, to more fully brief you in person. We will also have senior elected Tribal government officials who are championing these changes available for the meeting.

Mr. Secretary, we respectfully request your support during the remaining months of your administration to work with us to fix these problems. The FDPIR program is important to our citizens and shouldn't be allowed to languish or be plagued with seemingly insurmountable problems. We believe that the problems we outlined above, with very few exceptions, could be administratively fixed during the remaining months you are Secretary. We stand ready to serve alongside members of your team on a "working group" to tackle these issues.

Thank you so much for your kind attention to this lengthy letter that outlines the breadth of issues we believe should be addressed. We will contact your office within the week to seek a date certain for a meeting with you.

Sincerely,

Joe Van Alstine
NAFDPIR President

CC: Congressman Tom Cole; Senator Heidi Heitkamp; Senator Jon Tester; Senate Committee on Indian Affairs; National Congress of American Indians; Leslie Wheelock, OTR, USDA

From: [Castro, Laura - FNS](#)
To: [Joseph VanAlstine](#); [Wheelock, Leslie - OSEC](#); [Griffin, Josiah - OSEC](#); [Concannon, Kevin - OSEC](#); [Rowe, Audrey - FNS](#); [Christenson, Daniel - OSEC](#)
Cc: [Kriviski, Diane - FNS](#); [Lisi, Brenda - FNS](#)
Subject: RE: NAFDPIR FORMAL LETTER
Date: Thursday, August 13, 2015 3:44:58 PM

Joe:

Thanks for your letter. We will all be reviewing it thoroughly and look forward to discussing these topics with you when you visit us next month. One statement of immediate concern to us is on page 4: "We actually have pictures of some program sites that now have very little to no foods on the shelves." We have no indication from any FDPIR programs that they do not have enough food to serve participants at this time. If you are aware of specific programs that do not have enough food, please let us know now so that we can ensure all FDPIR programs are adequately stocked. We take our responsibility for FDPIR very seriously and appreciate your partnership in ensuring the program continues to serve participants effectively.

Thanks,
Laura

Laura Castro
Director, Food Distribution Division
USDA Food and Nutrition Service
3101 Park Center Drive
Alexandria VA 22302
Phone: (703) 305-2680



From: Joseph VanAlstine [mailto:JVanAlstine@LTBBODAWA-NSN.GOV]
Sent: Wednesday, August 12, 2015 3:22 PM
To: Wheelock, Leslie - OSEC; Griffin, Josiah - OSEC; Concannon, Kevin - OSEC; Castro, Laura - FNS; Rowe, Audrey - FNS; Christenson, Daniel - OSEC
Subject: NAFDPIR FORMAL LETTER

Good Afternoon,

I have included a letter to The Honorable Tom Vilsack, Secretary of the U.S. Department of Agriculture regarding the issues that are plaguing our program. A hardcopy has been sent to his office as well. These issues were discussed in June 2015 at our National Conference in Albuquerque, New Mexico. We have provided solutions to those issues in hopes of continuing or beneficial relationship and to pursue our mission. Which is to promote advocacy, policy and legislative changes which will favorably impact our primary goal of providing foods and services for hunger assistance and nutrition education to low income Native Americans.

Respectfully,

Joe Van Alstine, President
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United States Department of Agriculture

Office of the Secretary
Washington, D.C. 20250

NOV 04 2015

Mr. Joe Van Alstine
President
National Association of Food Distribution
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Dear Mr. Van Alstine:

Thank you for your letter of August 12, 2015, to me and my colleagues, in which you requested a meeting to discuss issues related to the Food Distribution Program on Indian Reservations (FDPIR) and expressed concerns held by the National Association of Food Distribution Programs on Indian Reservations (NAFDPIR). The meeting, which was held on September 28, 2015, afforded you, Kevin Concannon, Under Secretary of Food, Nutrition, and Consumer Services, and Food and Nutrition Service leadership and staff, an opportunity to engage in meaningful and open discussions that are reflected in this response.

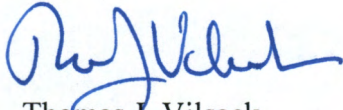
FDPIR is one of the U.S. Department of Agriculture's (USDA) most important nutrition assistance programs serving Native American communities. The program currently provides benefits to approximately 87,000 participants on average on a monthly basis and operates nationwide serving 276 small, medium, and large Tribes in need of food assistance. The individuals and families we reach every day through FDPIR exemplify the importance of the program and our shared goals to increase access to nutritious foods and promote good health through nutrition education and physical activity.

I am committed to working together to continue our collaborative efforts to improve FDPIR services for members of the Native American community facing food insecurity. As a followup to your recent visit, enclosed is a written response to the requests and concerns conveyed in your letter and, where applicable, the offer of some clarification and next steps for continued discussion.

Mr. Joe Van Alstine
Page 2

I congratulate you on your new role as NAFDPIR President. USDA is committed to the partnership with NAFDPIR and making FDPIR the best possible program for participants. Should you have questions, please contact Under Secretary Concannon at (202) 720-7711.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Tom Vilsack', with a stylized flourish at the end.

Thomas J. Vilsack
Secretary

Enclosure

The U.S. Department of Agriculture's (USDA) Response to the NAFDPIR Letter of August 12, 2015

Seat a Working Group

Your letter and subsequent meeting with Under Secretary Concanon and FNS leadership presented a request to seat a working group of appointed members from Tribal leadership, the Food and Nutrition Service (FNS), and the Office of Tribal Relations (OTR). I support increased dialogue with Tribal leaders. My staff will explore with you and the NAFDPIR Board a potential meeting schedule that would provide the opportunity for Tribal leadership to engage in a dialogue on FDPIR programmatic issues without duplicating the existing FDPIR Food Package Review Group.

Improve Computer Interface Systems

USDA welcomes input from NAFDPIR, FDPIR Indian Tribal Organizations (ITO), and State agency staff on business and technical requirements to support the FDPIR program. USDA recognizes the need to update and combine functions of computer systems supporting FDPIR in both food ordering and program administration. USDA recently awarded an initial contract to assess, design, and develop a new system to replace the Automated Inventory System (AIS) currently used by FDPIR. As work on the contract proceeds, USDA will request that the NAFDPIR Board identify individuals to participate in the project.

Funding to Meet Present and Future Needs

USDA recognizes the need for increased funding to support FDPIR administration and operations, including infrastructure and equipment needs as well as expansion to new program sites. USDA requests and receives funding to support all programs governed by FNS, including FDPIR, through Congress. In fiscal year (FY) 2014, Congress initially appropriated \$104 million for FDPIR to cover administrative expenses and food costs. During FY 2014, however, the program saw an unexpected rise in participation of more than 10 percent of participants served compared to the previous year. In response to the increase, FNS sought and was granted approval by Congress to reprogram \$15.5 million in funds from the Supplemental Nutrition Assistance Program (SNAP) account to FDPIR, resulting in a total funding level of \$119.5 million. In FY 2015, as trends in FDPIR participation continued upwards while food costs remained high, Congress increased funding to \$145.191 million.

In your letter, you referenced insufficient funding to support additional FDPIR sites in Alaska. While eighteen (18) Alaska Villages currently receive FDPIR services, there are additional Villages expressing interest in the program. FNS is discussing oversight and management of the current caseload with the administering ITO in Alaska and will pursue the possibility of additional sites through those discussions to determine if that expansion is feasible and in the best interests of the program. Additionally, our Office of Tribal Relations is also working with our Rural Development team to assess warehouse capabilities in Alaska that may be of help in supporting FDPIR.

Food Availability

Ensuring that the FDPIR food package meets the nutritional and cultural needs of the individuals and families we serve is of great importance to USDA. We acknowledge that there were challenges last year ordering and obtaining popular items from our national warehouses. As previously mentioned, these challenges were due to an unexpected increase of more than 10 percent in participation. While some items were unavailable, with your assistance, we continued to offer participants their full FDPIR benefits as products were available in each category to complete full food package issuances. Providing continued services to ITOs, and ultimately participants, is of utmost importance to our staff. Inventory levels have since stabilized, with a wide variety of FDPIR foods currently available and amply stocked across all food package categories.

The stability of FDPIR food inventory levels in the national warehouses continues, and all of the food package categories are well stocked. Given ample inventory levels at our national warehouses, we are extremely concerned to learn that some ITOs may be experiencing low inventory levels at their local program sites. Should an ITO have concerns with their local inventory levels, food orders, or shipments, including any risk of low food availability impeding delivery of full food packages to participants, it is of utmost importance that the ITO immediately contact the appropriate FNS Regional Office for timely resolution. FNS staff will immediately assist the ITO to expedite any food orders it may need to serve participants and provide technical assistance to help prevent recurrence.

It should be noted that FNS continues to proactively monitor participation and inventory trends to ensure, to the greatest extent possible, that food stocks remain at optimal levels moving forward. FNS' Food Distribution Division conducts monthly conference calls with the program community to discuss FDPIR inventories in the national warehouses.

Lean Warehouse Policy

We are discouraged to learn of the continued misunderstanding surrounding FDPIR inventory policy. USDA does not have a lean warehouse policy for FDPIR. Relevant inventory requirements for FDPIR are contained in Federal regulations at 7 CFR, parts 250 and 253, as well as FNS Handbook 501. Our regulations and FDPIR policies require ITOs and State agencies to monitor their local inventory levels and maintain inventories so that a one- to three-month supply of USDA food is available at any time. This requirement helps ensure that all FDPIR ITOs and State agencies have the USDA foods they need to serve participants, while at the same time preventing food losses and spoilage, which could negatively impact the program and participants. This is existing program policy and not a new requirement.

It should be noted that FNS is flexible on the three-month maximum, and it will not pursue sanctions against an ITO that receives a USDA food delivery that would place a food category slightly above this threshold on a short-term basis. We welcome discussions on this topic should NAFDPIR require additional clarification, and we would be happy to work with you to provide additional training and guidance to assist with inventory management.

FDPIR Study

One of the current ongoing FNS studies is of the FDPIR. This study was awarded in September 2011 to The Urban Institute. The study results will assist FNS in enhancing program administration to the benefit of both ITOs and participants, and it will help identify ways for FNS to work with participating Tribes to continue to improve an already strong program. There are two subcontractors: Support Services International, Inc. (SSI) and the National Opinion Research Center at the University of Chicago (NORC). SSI is an American Indian-owned firm that was founded in 1979 and provides consulting services to Federal agencies, Indian Tribes and organizations, and private and public sector organizations in the areas of information technology, housing, business and economic development, health, education, and welfare.

In addition, to improve survey responses, the research team hired Tribal members to conduct household interviews. The contract schedule incorporates time for NAFDPIR Board members and participating Tribes to review a draft report. USDA currently expects the draft report as early as the second quarter of FY 2016. USDA looks forward to sharing the draft report with NAFDPIR for comments once it is available.

Regional Vendor Pilot

We share your concerns with regard to discontinuation of the FDPIR regional vendor pilot. When USDA initiated the pilot, we were optimistic that it could provide a viable alternative to our current distribution system and we wanted it to succeed.

As background, in May 2013, we began a pilot to test a model that could potentially provide FDPIR participants an alternative distribution model to achieve potential cost savings for the program in reduced storage and transportation fees. USDA started the regional vendor pilot in FY 2013 using existing program funds from the appropriated budget, and we anticipated sufficient resources in the coming years to allow for the expansion of this model to more ITOs. Unfortunately, in FY 2015, at the beginning of the fiscal year, Congress enacted a continuing resolution, which provided only a limited amount of short-term funding for FDPIR and other USDA nutrition assistance programs. This served to significantly constrain available resources to operate FDPIR. After receiving a full-year appropriation, FDPIR continued to experience budget constraints as a result of higher program participation levels, higher food costs for food package items, and higher than anticipated costs associated with the pilot itself. We were forced to make difficult decisions as to how to prioritize available resources to ensure that program participants at all FDPIR ITOs were receiving the food package benefits they needed. Given the budget constraints and the significant costs associated with the pilot, USDA could not expand the model as intended and ended all pilot activities effective March 26, 2015.

USDA is currently examining the causes of the high pilot costs and considering what alternatives might be more cost effective. In addition, an evaluation is being conducted to assess the results of this pilot at the four selected sites. The findings of the evaluation will be used to consider future requests for funding efforts in this regard in addition to analyzing favorable aspects of the pilot that may be able to be incorporated into USDA's existing processes. The draft of the evaluation report will be available to USDA as early as the first quarter of FY 2016. USDA will

ensure that the ITOs involved with the regional vendor pilot will be afforded an opportunity for input on the draft of the report before its final release. The draft report will also be shared with NAFDPIR.

Product Issues and Best If Used By (BIUB) Dates

FDPIR has one of the highest Healthy Eating Indexes (HEI) due to the nutritious offerings provided in the monthly food package. Currently, we participate in the U.S. Department of Defense's Fresh Produce Program (DoD Fresh), which provides participating ITOs and State agencies with a variety of fresh fruits and vegetables in smaller quantities, in real time, and at their locations. This is an important program since 91 percent of FDPIR sites provide the fresh fruit and vegetable option to participants.

USDA was made aware of instances where produce of poor quality was received by ITOs located in the Midwest Region during 2014. We took action in this regard and renegotiated our service agreements with DoD to better address quality, delivery, and customer service. Though the immediate issue was resolved, we will continue to explore contractual options with DoD to ensure delivery of quality fresh produce and replacement product, should it be warranted, in a timely manner. Our commitment is to minimize occurrences of subpar fresh products when at all possible. We request the ITOs' assistance in this regard and ask that FDPIR ITOs and State agencies immediately notify the appropriate FNS Regional Office should such an issue occur, so that it can be addressed as quickly as possible. We will be collecting data on the number of times such notifications occur and where so that we have factual information to present to the DoD.

USDA strives to ensure the timely delivery of USDA foods in peak condition. FNS' federally-contracted warehouses are directed not to ship product to FDPIR warehouses if product is within two months of its best-if-used-by (BIUB), or reflects a similar date. In the rare instance that such a delivery occurs, FDPIR ITOs and State agencies should immediately contact their respective FNS Regional Offices for further instruction. FNS Regional Offices will review the circumstances and provide guidance on how the product may be distributed in a timely manner. Distribution could include the provision of such foods to other outlets including, but not limited to, Tribal and non-Tribal food banks, food pantries, and soup kitchens. In addition, FNS will work with FDPIR ITOs and State agencies to expedite product replacement should circumstances warrant.

In FY 2015, FNS' Food Distribution Division created a new Program Integrity and Monitoring Branch that will focus on providing technical assistance to all food distribution programs, including FDPIR. The group will also focus on the food complaints system currently used by FDPIR staff and work to enhance customer satisfaction with the system.

Matching Funds Requirement

FNS concurs that the waiver process should be more uniform and will work to ensure that the process is more consistently implemented across the FNS Regional Offices. NAFDPIR input is welcomed in this regard. Per FDPIR program regulations, USDA provides administrative funds to cover 75 percent of the total approved budget (Federal share), while each FDPIR-

administering agency must contribute 25 percent of its total approved administrative costs. This matching requirement may be met by cash or non-cash (in-kind) contributions. Currently, a waiver provision exists that allows an ITO to request, with appropriate justification, approval to lower their match. As part of the waiver provision, the FNS Regional Office may, at its discretion, approve a reduction of the match. In addition, the FNS Regional Office may provide additional administrative funds, should such funds be available, to cover more than 75 percent of approved administrative costs to an ITO that provides appropriate justification. However, this process must be done within the funds made available to USDA by Congress for the administration of FDPIR. Though FNS would not reduce the Federal allocation below 75 percent of the negotiated and final approved budget, funding appropriated by Congress may be insufficient to provide funding to the ITO above that level should the ITO be unable to meet the match.

Nutrition Education

Though dedicated nutrition education funds are provided to FDPIR, USDA would like to work together with NAFDPIR Board members and its membership to explore avenues to increase nutrition education funding and resources in FDPIR communities and optimize them to provide the greatest benefit to FDPIR participants. In addition to dedicated FDPIR nutrition education funding, another such resource is SNAP-Ed. SNAP-Ed funding is allocated by each State to implementing agencies based on its annual FNS-approved SNAP-Ed Plan. FNS requires States to consult with Tribes about the SNAP State Plan of Operations, which includes the SNAP-Ed State Plan. FNS ensures that States actively engage in Tribal consultations as required by SNAP regulations at 7 CFR 272.2(b) and 272.2(e)(7) and also reflected in FNS SNAP-Ed Plan policy guidance. The consultations must pertain to the unique needs of the members of Tribes. FNS expects States to consider the needs of Tribal populations in conducting their needs assessments for SNAP-Ed and to consult and coordinate with State and local operators of other FNS programs, including FDPIR. FNS approves State SNAP-Ed plans and, in doing so, reviews the plans to ensure they have made every effort to include a focus and devotion of resources to Tribal nutrition education. In support of this collaboration, FNS will work to develop information to help FDPIR directors and staff better understand SNAP-Ed and the process for obtaining such resources.

We encourage FDPIR programs to foster relationships at the Tribal level with other nutrition assistance programs, local health departments, and university extension programs to help with onsite nutrition education implementation, particularly organizations that may be submitting proposals to the State to receive SNAP-Ed funding. FDPIR programs may obtain SNAP-Ed State and local contact information from FNS Regional Office SNAP-Ed Coordinators or through FNS' SNAP-Ed Connection at <https://snaped.fns.usda.gov/state-contacts>.

Carry Forward Policy

FDPIR administrative funding is appropriated by Congress each fiscal year. In our review, we determined that the vast majority of FDPIR programs have very little unobligated funding at the end of each fiscal year. However, we understand the challenges posed by one-year funding and share your concerns. We are closely reviewing how a change in policy may benefit FDPIR and

options that could be considered under current law. Moving forward, FNS will keep NAFDPIR and the program community apprised in this regard.

Traditional Foods Procurement

The 2014 Farm Bill reauthorized the 2008 Farm Bill provision (Section 4211 of the Food, Conservation, and Energy Act of 2008, P.L. 110-234), which provided for the establishment of a fund, subject to the availability of appropriations, for use in purchasing traditional and locally-grown foods for FDPIR. The Consolidated and Further Continuing Appropriations Act of 2015, (P.L. 113-235), which was enacted on December 16, 2014, funded this provision for the first time in the amount of \$5 million for FY 2015. Prior to FY 2015, appropriations were not provided by Congress to meet the provision.

To better understand participant food preferences, including cultural foods, the FDPIR Food Package Review Work Group (Work Group), comprised primarily of NAFDPIR-appointed members, meets regularly during the year to discuss potential new food items to increase the healthfulness and appeal of the FDPIR food package. In recent years, particularly FY 2015, the Work Group discussions provided a preference to expend the entire \$5 million in traditional foods funding.

Bison was selected by the Work Group members as the traditional food to procure with the available funds. Following procurement rules, USDA issued a solicitation for the product in March 2015, and we awarded a contract for several trucks of bison in April 2015. The contracted vendor was unable to meet all of their obligations due to limited bison availability. USDA issued a second solicitation in July 2015 for bison and revised its specifications to better accommodate market conditions and available products. We are pleased to report that the second solicitation resulted in an additional awarded contract for bison to a new vendor. USDA received the first delivery of bison in October 2015. USDA expects to fully expend the \$5 million in traditional foods FY 2015 funding on bison.

In addition to bison, as recommended by the Work Group, USDA recently made an initial purchase of blue cornmeal for FDPIR. Deliveries are expected to begin in the first quarter of FY 2016. USDA will continue to consult with the FDPIR Food Package Review Work Group and keep NAFDPIR Board members apprised regarding the status of traditional foods in FDPIR.

Feasibility of Tribal Administration of Nutrition Assistance Programs Study

The Feasibility of Tribal Administration of Nutrition Assistance Programs study, required by the 2014 Farm Bill, uses a community-based, participatory research approach, intended to ensure an opportunity for the study team and Tribal governments and leadership to connect in meaningful and consultative ways. This included outreach via telephone consultations and other approaches, telephone and in-person discussions with Tribal stakeholders, and attendance at Tribal conferences. Tribes were also given the opportunity to test and comment on the data collection instruments.

In response to comments from Tribal representatives, key changes were made to the survey instrument. First, while USDA originally planned to focus only on the four largest programs that Tribes currently do not administer as State Agencies – the Supplemental Nutrition Assistance Program (SNAP), the National School Lunch Program (NSLP), the School Breakfast Program (SBP), and the Summer Food Service Program (SFSP) – we modified the survey to include questions about Tribal interest in other FNS programs, including the Child and Adult Care Food Program (CACFP) and The Emergency Food Assistance Program (TEFAP). Second, while the Special Supplemental Food Program for Women, Infants, and Children (WIC) and FDPIR were not included in the draft data collection instruments, as Tribes already administer those programs, during pre-testing of the survey instruments, several Tribal representatives commented that the experiences Tribes have had administering these programs could provide valuable insight to the study. Therefore, changes were made to the survey instruments to collect information on Tribal Organizations' experience with those programs. The final report will include an overview of the administrative requirements of CACFP, FDPIR, NSLP, SBP, SFSP, SNAP, and WIC.

The survey was sent to all 566 Tribes that were Federally-recognized at the time to provide every Tribe with an opportunity to contribute to the study. In addition, the study team visited a representative sample of 16 Tribes, Native Villages, and/or Alaska Native corporations to collect indepth, qualitative information to supplement the survey data and provide context to the survey responses. Considerations, such as experience administering Federal programs, size of the Tribe, and geographic location, were used to determine which locations were visited as part of the representative sample. FNS plans to brief the Tribes on the study findings before the report is submitted to Congress.